

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0009901, State: IN, Program Year: 2023)

This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Provide a description of the definition of income used to determine eligibility

2.1 Income Eligibility and Documentation

The Weatherization sub-grantee staff or its subcontractor is obligated to review and determine WAP eligibility status for anyone requesting an application. No unit will be weatherized without documentation that the unit is eligible. [10 CFR 440.22](#). The local sub-grantees verify applicant's income during the application process.

The Weatherization sub-grantee's staff or its subcontractor are obligated to review and determine WAP eligibility status for anyone requesting an application. Clients may not be denied the right to submit a WAP application by the Weatherization sub-grantee or its subcontractors.

Per [10 CFR 440.22](#), a unit shall be eligible for Weatherization assistance if it is occupied by a family unit:

- Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of Office of Management and Budget. [Poverty Guidelines](#).
- Which contains a member who has received cash assistance payments during the twelve-month period under Title IV and Title XVI of the Social Security Act.
- Is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

At the beginning of each calendar year, newly approved poverty guidelines for the program year are issued. To be consistent with the Energy Assistance Program (EAP) intake, Weatherization and EAP will both update their income eligibility guidelines annually.

Child Support, Foster Care, and Adoption Assistance

Child Support, Foster Care, and Adoption Assistance payments, whether received by the Payee or paid by the Payor, are not considered Sources of Income to be added to the Payee income or deducted from the Payor income for the purposes of determining applicant eligibility.

- Payee: Where an applicant receives Child Support from any state program or individual during an applicable tax year, such assistance is not considered income for the purposes of determining eligibility (i.e., where an applicant receives Child Support, he or she does not add that amount to his or her calculation of income for purposes of determining eligibility). This is in line with Indiana's EAP income guidelines.
- Payor: Where an applicant pays Child Support through a state program and/or to an individual, such assistance is not considered a deduction to Income for the purposes of determining eligibility (i.e., where an applicant pays Child Support, he or she may not deduct said assistance from his or her calculation of income for the purposes of determining eligibility). Indiana's EAP income guidelines are not consistent with this guidance. **Income will need to be re-calculated for clients with this scenario.**

Sub-grantee must clearly document which households receive payment for foster care and/or pay or receive child support. These notes and income recalculation documents must be included in the Weatherization client file. If minor errors are found in the EAP file, the Weatherization sub-grantee should notify the EAP Local Service Provider. Major errors or issues should be brought to the attention of IHCD. [WPN 21-3](#).

Client Eligibility Documentation

IHCD requires all sub-grantees ensure client eligibility during the period in which services are delivered. Clients which are deemed categorically eligible as a result of their LIHEAP and/or HUD eligibility will have their most recent application date transferred into their IWAP record. Sub-grantees must ensure services are delivered within one year of the most current application date or the client income must be reverified. Files of clients not categorically eligible through EAP and/or HUD must contain a copy of the application and income documentation. Guidelines for household income calculation are found in the most current version of the *Indiana Energy Assistance Program Operations Manual* at MyIHCD's [EAP](#) or [WPN 21-3](#).

Households that are categorically eligible have several of the required items in their EAP file. A client's Energy Programs Application (EAP) must be active at the time the weatherization services are provided and at the time of QC inspection. Information, such as income verification, does not need to be duplicated. During monitoring, IHCD or any contracted monitoring entity reserves the right to inspect the EAP client income verification to ensure client eligibility.

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Subgrantees may certify that applicants have met the income requirements of HUD means-tested programs through mechanisms including, but not limited to, applicant documentation, interagency lists of recipients, shared system databases, etc. Method of verification of eligibility must be included in the client file.

Approach to Determining Eligibility

If Weatherization work cannot be completed before the application expires a new application is required to be completed. It is considered best practice in this case to complete work before the application expires. Recertification of eligibility must occur every 12 months. If a job is not completed, i.e. it has not passed QC inspection, and the application has expired, and the client is no longer income eligible, contact IHCDA.

3.2 Required Forms

Required Forms

A client's **Energy Assistance Program (EAP) application** must be active at the time weatherization services are provided and at the time of QC inspection. An application is considered active for a twelve-month period starting from the date of the initial approved application when the client income verification was completed. Before work is started, be sure the income verification on the application is within the allowable twelve-month period. If the version in the EAP database is the most current, no paper copy is required. If a client has an expired application in the EAP database and recently reapplied, a current paper copy is required in the client file. A paper copy may be requested by IHCDA program monitors when reviewing client files. Sub-grantees must utilize the most recent or current approved application.

A client's HUD Section 8 Voucher and proof of HUD housing. HUD housing does not expire, and the client will be categorically eligible by their residence.

Income documentation verifying total household income for the 3 months prior to application should be available. If categorically eligible under EAP, income information does not need to be copied for the weatherization file. For the purposes of monitoring, EAP files must be made available. Sub-grantees must use a form or method of income calculation that is consistent with guidelines as written in the most current version of the *Indiana Low Income Energy Assistance Program Operations Manual* at MyIHCDA's [EAP](#). Because files are subject to review, both by state and Federal agencies, it is imperative that case files accurately reflect the computation of household income.

The **Zero Income Affidavit** must be used to verify zero income for **each** household member, age 18 and over, who claim no income for the 3 months prior to the application date. In addition to a completed form, each zero-income claimant must have an attached **wage inquiry or income summary from the local Workforce Development Office**. This is no longer completed during the EAP application process but is a DOE requirement that must be completed by the Weatherization sub-grantee. *Appendix S – Zero Income Affidavit*. According to the U.S. Department of Energy [WPN 21-3](#) under Section D Proof of Eligibility #3 Self Certification, zero income claimants must have a **notarized** affidavit claiming zero income for Low Income Weatherization Assistance. IHCDA requires a notarized Zero Income Claimant Form to be in each client's file who claims zero income. All sub-grantees must use this form for all WAP applications. The form must be notarized in compliance with [WPN 21-3](#). The form must be signed by the Zero Income Claimant **or** the person who completes the application on behalf of the household. If the signatory is not the zero-income claimant, the person must be listed as a household member on the EAP application.

Describe what household eligibility basis will be used in the Program

2.1 Income Eligibility and Documentation

Per [10 CFR 440.22](#), a unit shall be eligible for Weatherization assistance if it is occupied by a family unit:

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copy of the application and income documentation. Guidelines for household income calculation are found in the most current version of the *Indiana Energy Assistance Program Operations Manual* at MyIHCDA's [EAP](#) or [WPN 21-3](#).

Households that are categorically eligible have several of the required items in their EAP file. A client's Energy Programs Application (EAP) must be active at the time the weatherization services are provided and at the time of QC inspection. Information, such as income verification, does not need to be duplicated. During monitoring, IHCDA or any contracted monitoring entity reserves the right to inspect the EAP client income verification to ensure client eligibility.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

Indiana's Weatherization Assistance Program will follow the same procedures outlined within Indiana's [LIHEAP EAP Program Operations Manual](#). Indiana's approach to ensuring qualified aliens are eligible for weatherization benefits is as follows:

Eligible household members must be United States (U.S.) citizens, U.S. Nationals or qualified non-US citizens (aliens) as defined by [8 USC 1641\(b\)](#). Applicants submitting Social Security Cards (SSNs) will not have to submit any other kind of proof of citizenship or qualified non-US Citizen Status. Persons who are not citizens or qualified non-US citizens are considered to be ineligible household members. Ineligible household members living with eligible household members do not disqualify the family from receiving assistance.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

2.3 Building Eligibility and Documentation

A building may be determined ineligible for weatherization if its structure would prohibit it from ever being weatherized. Any building that **could be** weatherized after health and safety or other repairs must **not** be considered ineligible. To be eligible for weatherization a building must provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, eating, cooking and sanitation. If you cannot make a clear determination based on the information provided in this document, please refer to the *2020 Indiana Residential Code* and/or contact INCAA Wx training to assist you in your determination. Please include meaningful photographs of the structure and overall property when determination assistance is requested.

Land Contracts: If a land contract is in place, then it must be recorded with the assessor's office to be considered valid. If valid, then the land contract can be treated as if the client has a mortgage on the home. The client would be considered a homeowner.

In the following circumstances, **exceptions** to the required documentation policy will be permitted:

- **Shelters:** a unit or units whose principal purpose is to house on a **temporary** basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.
 - An application and eligibility determination is not required for shelters
 - Sub-grantees may weatherize shelters. For the purpose of determining how many units exist in a shelter, a grantee may count each 800 square feet of living space within the shelter as a unit or it may count each floor of the shelter as a unit.
 - An individual file must be kept for the shelter project. This file must contain:
 - Shelter's mission statement
 - Occupancy type
 - NEAT/MHEA/MulTEA form
 - All other applicable documents
 - For IWAP reporting purposes, each completion should be counted as "Data Unavailable" when reporting income categories and demographics. The box "Demographics Not Available" must be checked at the bottom of the IWAP application page.
 - IHCDA does not require prior approval to weatherize a shelter
- **Multi-Family Buildings:** Multi-Family Buildings: Buildings with 5 or more units. In the weatherization of multi-family buildings, DOE regulations require that 66% (50% for duplexes and quadplexes) of units in the building must be eligible households or will become eligible within 180 days. [10 CFR 440.22 \(b\)](#)
 - Small multi-family buildings are comprised of 5-24 units
 - Large multi-family buildings are comprised of 25+ units
 - For more information pertaining to weatherizing multi-family buildings refer to the Multi-family section.

4.2 Overview of Weatherization Activities

Previously Weatherized

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Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services have been provided. A determination must be made if the building has been previously weatherized in order to be considered eligible. Find eligibility requirements in Section 2.3.

DOE: The following actions must be taken on each DOE unit prior to weatherization services to ensure that units that have received weatherization services within **15 years** are not re-weatherized:

- **Each client's address must be checked in IWAP for previous weatherization within 15 years**
- Each client must be asked whether their unit has been weatherized within 15 years
- A visual inspection of each unit must be performed by an energy auditor to identify if previous weatherization measures have been performed

If there are no documented, verbal, visual, or physical evidence of previous weatherization services, the sub-grantee may proceed with weatherization services on the unit. If any of the above actions indicate or suspect that weatherization services have previously been rendered in a unit, the sub-grantee must check with the local agency that has historically provided weatherization services in the area to inquire about any records pertaining to the address. "Rework" is different from a "re-weatherized unit". See Section 4.7.

Indiana's policy for the weatherization of rental units complies with [10 CFR 440.16\(i\)](#), and all other pertinent regulations. Sub-grantees must have written permission of the building owner or his agent before commencing, and are required to have and abide by their written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the sub-grantee has adopted.

Landlord agreement forms must be included in the files of all weatherized rental units. At a minimum, landlord agreements must state that:

- For a one-year period after the weatherization work on the unit is completed, rent cannot be increased, unless the increase is not related to weatherization services performed. [10 CFR 440.22\(b\)\(3\)\(ii\)](#).
- Landlord and/or other contributions shall be expended in accordance with the agreement between the landlord and the weatherization sub-grantee, as noted in [10 CFR 440.22\(d\)](#). Written permission of the landlord, or the landlord's agent, must be obtained prior to the weatherization of the **unit**.

Sub-grantees may choose to develop a Weatherization application to collect information from potential clients that do not wish to apply for the EAP program, or to collect additional information that the EAP application does not gather. The use of such an application is not required, and any Weatherization application would use the same income eligibility determination as the EAP program.

Describe Reweathering compliance

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Describe what structures are eligible for weatherization

Indiana's sub-grantees may weatherize single site built homes, mobile homes (manufactured housing), shelters and multi-unit buildings. Indiana's sub-grantees may also Weatherize units for both homeowners and renters. The selection process is based upon client eligibility, established priority guidelines, and information gathered during the initial audit.

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Once a unit is determined to qualify for services, it is up to the Energy Auditor to determine if the unit is a candidate to receive weatherization services or if the unit should be deferred.

IHCDA holds a programmatic agreement with the Indiana State Historic Preservation Office Regarding EECBG, SEP & WAP undertakings. The original agreement was signed June 2012 but pursuant [78 FR 16138](#), dated March 14, 2013 the agreement was extended through Dec 31, 2030. The agreement and extension notification can be found as an attachment to the SF-424.

Please reference V.1.1 Approach to Determining Client Eligibility, V.1.2 Approach to Determining Building Eligibility, V.3 Priorities, and V.5.2 Energy Audit Procedures descriptions within this Master File.

Describe how Rental Units/Multifamily Buildings will be addressed

Monitoring

All multi-family projects containing **5 or more units** will have a minimum of 10% of those units monitored.

Procedure for Certifying Income-Eligible HUD Assisted Buildings

Prior to 2017, HUD provided lists of HUD Multi-family Property Listings Eligible for Weatherization Assistance to DOE for posting on DOE's website; however, the previously-published lists of eligible buildings expired on December 31st, 2016. New building lists will be provided by HUD using the new procedure outlined in this guidance.

HUD has developed an income certification process for individual properties that relies on certified annual income records and building information maintained by the property owner pursuant to Federal requirements. This process has been determined to comply with the requirements of the January 25th, 2010 rule. Owners or managers of HUD Qualified Assisted Buildings seeking WAP funds may continue to use this Property Certification Procedure for individual properties, as outlined below.

Following [WPN 17-4](#), to ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD: 1) a **Property Self-Certification** form that specifies that the building in question meets DOE's income eligibility requirements and, 2) a **Property Occupancy Report** from current property records that confirm compliance with DOE's income eligibility requirements.

I. Property Certification

The property owner or authorized agent of the property must sign a Self-Certification form attesting that:

1. The property owner or authorized agent maintains certified income records for households residing at the property.
2. The property owner or authorized agent has reviewed its current certified income records.
3. The property owner or authorized agent has determined that at least 66 percent of the units in each building (or at least 50 percent of the units for 2- and 4-unit buildings) have certified incomes that are at or below 200 percent of the current federal poverty level based on household size.
4. The property owner or authorized agent certifies that all the information provided with the certification request is true and accurate.

A multifamily property certification form is attached for use by property owners or authorized agents.

II. Property Occupancy Report

The property owner or authorized agent must also complete and submit an Occupancy Report for the property.

A **Multifamily Occupancy Report** worksheet file is attached for completion by property owners or authorized agents. The file contains a **Property Information** worksheet and **Building-Unit** worksheets that must be completed for each building. The income information requested should be available from standard occupancy reports prepared for the property.

Required property information includes: property name, HUD contract number, contract expiration date, other property identification number (if applicable), property address and the number of buildings and units that are at the property and that meet DOE's income requirements.

Required building-unit information includes a listing of all units and information for each units including: building identification, building address, certified annual income, household size, and whether the household income was certified in the last year.

Upon completion of the **Property Certification** and the **Multifamily Occupancy Report**, the property owner (or property owner's representative) will submit both files to HUD at energyaction@hud.gov and to DOE at Derek.Schroeder@ee.doe.gov.

III. HUD Review

1. HUD will review the certification and accompanying documentation for completeness. If the documentation submitted by the property owner is insufficient for HUD to complete its review, HUD will notify the property owner via e-mail that the request cannot be approved based on the information submitted.
2. HUD will review the household and property information provided under the self-certification process with records maintained by HUD, and may request additional

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occupancy information subject to Federal requirements.

3. If the documentation is complete and one or more of the buildings at the property meet DOE's income eligibility requirements, HUD will designate the property or list of qualified buildings as income qualified properties/buildings, and will notify Derek Schroeder at DOE and the building owner.
4. HUD will at the same time provide DOE with a list of the income-certified buildings pursuant to the above procedures; DOE will post these lists on its web site as required by [10 CFR 440.22\(b\)](#).
5. Buildings determined by HUD to be eligible for WAP assistance will be posted on one of two lists:
 - a. List 1 – Public housing buildings or privately-owned buildings with three or more years remaining on their affordability contracts with HUD are included on this list. As outlined in the January 2010 Final Rule, inclusion on List 1 demonstrates compliance with the following three WAP multifamily program requirements: (1) DOE's income requirements; (2) protection against rent increases; and (3) protection against undue enhancement of the weatherized building.
 - b. List 2 – Buildings on this list have less than three years remaining on their Housing Assistance Payments (HAP) contract with HUD. As outlined in the January 2010 Final Rule, inclusion on List 2 demonstrates compliance with only the following two multifamily program requirements: (1) DOE's income requirements; and (2) protection against undue enhancement of the weatherized building. Buildings on this list must separately comply with the WAP program requirement for protection against rent increases.

U.S. Department of Agriculture (USDA) and Low Income Housing Tax Credit (LIHTC) Properties

The certification procedures outlined in this Guidance do not apply to LIHTC properties, or for properties with USDA guaranteed loans. The LIHTC and USDA lists of income-eligible properties are no longer valid and will no longer be updated; WAP providers should follow standard procedures for verifying individual resident incomes for USDA and LIHTC properties.

Describe the deferral Process

4.4 Deferral Standards

Although a client may meet eligibility requirements for weatherization, the sub-grantee may defer the unit for weatherization services as a result of the unit not being suitable for weatherization services. A deferral may occur due to problems that are beyond the scope of weatherization such as condition of the structure, area is slated for redevelopment or health and safety reasons. Deferrals can take place during any phase of the weatherization process. This includes, but is not limited to the following:

- Pre-audit inspection
- During the energy audit
- During HVAC work
- During SHELL work
- During the quality control inspection
- Any other time during the course of Weatherization

A pre-audit inspector, energy auditor, HVAC professional, Crew Leader, Quality Control Inspector have the authority to recommend deferral to the Program Manager. All deferral initiations must be reported to the Program Manager. Any time a unit visit is conducted that results in a deferral, a formal written deferral letter, as described below, must be submitted to the client. All Weatherization work must be postponed until the deferral issues have been remedied by the client and/or by an alternate funding source. Below is a non-comprehensive list of possible justification for deferral:

- Client refuses a Health and Safety Measure
- Client refuses a Major Measure, as described in Attachment 8 of [WPN 19-4](#) Client or client family/friends in the unit are uncooperative, abusive, threatening, engaged in illegal activities
- Signs of illegal activities in the unit; i.e.: hypodermic needles, drug paraphernalia, unsecured firearms and/or weapons, etc.
- Moisture issues
- Raw sewage or other sanitary issues
- Pests, insects, vermin, and/or rodents
- Unit is for sale, foreclosed, and/or owner will not be residing in the unit throughout the weatherization process
- Applicant is deceased
- Lead based paint conditions that could endanger the health of the occupants or workers
- Unit has been condemned
- Unit has structures issues that could endanger the occupants or workers
- Unit is under construction or being remodeled
- Application parameters do not reflect current household
- All other conditions that could endanger or compromise the well-being of the occupants and/or Weatherization professionals

At any point when a unit is deferred, the client must be provided with written notification of the deferral. The written notice must be in compliance with [WPN](#)

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[22-7](#) and IHCDA State Plan. A copy of the written notification of deferral to the client must be placed in the client file. The client must also be given a copy of the signed and dated Moisture Assessment form. A copy of this form must also be in the client file. For each deferral issue within the unit, there must be a meaningful corresponding photograph of the issue(s) in the client file. The deferral notification to the client must include the instructions for pursuing an appeal to the deferral. This appeal must follow established protocol outlined in the Appeals Procedure section of this manual. The deferral notification must be sent to the client in writing and must include the following:

- A signed Moisture and Home Assessment Form
- Reason(s) for deferral
- Actions and timeline required by client to receive Weatherization services
- Appeal process

When a deferral occurs once the weatherization process has commenced, all work is required to be completed and pass a QC inspection by a QCI within 12 months of the application date in order to be counted as a completion. If this is not possible, the sub-grantee must submit the following documentation to IHCDA with the following information for a Provisional Closeout, which may be approved by IHCDA, but will not count as a completion:

- Meaningful photographs of the cause(s) for deferral
- Moisture Assessment Form
- Documentation of client education as required per [WPN 22-7](#)
- Client Health Screening, when applicable
- Concise timeline beginning with approved application date, date of pre-audit (when applicable) date of audit, date of HVAC, date of SHELL, date all deferrals
- Justification stating the reason work could not be completed in a timely manner
- All other documentation as requested by IHCDA

The cost associated with deferred units are an allowable **expense** under Base Program Operations, **Health & Safety and/or LIHEAP**. **Following all current funding grant rules**, sub-grantees must document on the deferred invoice that the charge was for a deferred unit and it not attributed to any particular completion. All costs must be reported in IWAP.

All agencies will pursue alternative funding resources to reduce the occurrence of deferral. Agencies should establish lines of communication with other funding sources so that referrals can occur in an efficient manner. The following is a list of potential funding sources to help remedy situations in a unit:

- U.S. Department of Housing and Urban Development (HUD) - HOME Program
- HUD - Community Development Block Grant
- U.S. Department of Health and Human Services - Community Services Block Grant
- U.S. Department of Agriculture - Rural Economic Community Development
- State-funded housing and rehabilitation programs
- Low-income program funds provided by local utilities
- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups
- State Deferral funds as outlined in Section 10

The costs associated with deferred audits are an allowable charge under Base Program Operations. Those agencies using contractors must be able to document on the deferral invoice that the charge was for a deferred unit and is not attributable to any particular completion. Pictures documenting the conditions leading to deferral must be placed in the client file.

When possible, IHCDA monitoring staff reviews at least two deferred client files during monitoring.

2.4 Appeals Procedure

When a Weatherization sub-grantee determines that a household is ineligible, the sub-grantee, within 10 business days, must provide a written denial to the client detailing the reason(s) for the denial and advising them of their right to appeal the decision. Weatherization sub-grantees must retain in the client file a copy of the denial letter with the appeal procedure that was sent to the client.

Pictures must be taken to document the conditions leading to deferral and must be placed in the client file.

IHCDA strongly recommends that the **Applicant Notification Form** found in *Appendix R* be the basis of any form created by the Weatherization sub-grantee to notify weatherization clients of their denial of services.

Applicants may appeal a denial. Allowing a client to appeal a sub-grantee's decision is mandatory for the Weatherization Assistance Program. The appeals

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procedure must be communicated to households whose assistance has been denied. When the sub-grantee provides written notification of denial to an applicant, the notification must include the household's right to appeal that determination.

The "right to appeal" information provided to any denied household must contain the following two processes:

- **Local Review:** The client must send their written appeal to the local sub-grantees Weatherization Manager or Executive Director within 30 days of receipt of the denial. The sub-grantees Executive Director or Weatherization Manager determines the applicant's eligibility on review within 10 business days of receipt of the applicant's written appeal. All appeal documentation must be saved in the client file and IHCDA's Community Programs Manager - Weatherization must be notified of denied appeals. The final determination for the appeal must be sent to the client in writing by the sub-grantee's Executive Director.
- **State Review:** If the client is not satisfied with the sub-grantee's determination, they may request formal review by the State, but it must be submitted in writing. This request is made by submitting the appeal to IHCDA's Director of Community Programs. The sub-grantee may submit this appeal on behalf of the client or the client may submit it directly to IHCDA. This request for formal review must be made within 30 days of receipt of the sub-grantee's appeal determination. The appeal must include the stated reasons for the Client's objection to the decision, reasons must be based solely upon evidence supporting one of the following circumstances:
 - o Clear and substantial error or misstated facts which were relied on in making the decision being challenged/appealed
 - o Unfair competition or conflict of interest in the decision-making process
 - o An illegal, unethical or improper act; or
 - o Other legal basis that may substantially alter the decision

The appeal must be made in writing and received by the Indiana Housing and Community Development Authority (IHCDA) within 30 days of receipt of the sub-grantee's final decision. The appeal is to be sent to the IHCDA's Director of Community Programs who will make the final determination. The client will receive written acknowledgement of receipt of the appeal by the Director of Community Programs within 5 business days, noting the day the appeal was received. All pertinent material from the case will be requested from the Weatherization sub-grantee by IHCDA in order to make a determination. The applicant, as deemed appropriate, shall have the opportunity to review all documentation submitted to IHCDA. The Director of Community Programs will have 30 days from IHCDA's receipt of the written request for appeal to review the file and make a determination. The decision of the Director of Community Programs is final.

This appeals policy also applies to clients who may be dissatisfied with the weatherization work after it occurs, within the one-year warranty period. The client must send their written appeal to the local sub-grantees Weatherization Manager or Executive Director within 30 days of receipt of the denial. The sub-grantee must then follow the right to appeal process detailed above.

V.1.3 Definition of Children

Definition of children (below age): **18**

V.1.4 Approach to Tribal Organizations

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

Native Americans are served in the general population and will be eligible to receive benefits equivalent to the assistance provided to other low-income persons living in Indiana.

V.2 Selection of Areas to Be Served

Selection of sub-grantees to implement the Weatherization Assistance Program is made in accordance with [10 CFR 440.15\(a\)](#). Preference is given to any sub-grantee that has administered, or is currently administrating, an effective program, with program effectiveness evaluated by consideration of factors including, but not limited to:

- Demonstrated ability to achieve projected goals and objectives,
- Quality of weatherization work as demonstrated by past program performance,
- Ability to staff program with qualified, trained, and experienced employees,
- Previous program experience, both in weatherization and other low-income program, and
- Ability to fulfill procedures for fiscal record keeping under Indiana and Federal codes.

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IHCDA contracts with twenty (20) sub-grantees to cover Indiana's 92 counties. Of the 20 sub-grantees, 19 are Community Action Agencies, and JobSource (DBA Central Indiana Community Action Program) is a unit of local government.

If one of the current 21 sub-grantees is unable to administer the Weatherization Program in their respective county or counties, or if their program is cited for non-compliance, corrective actions will be taken. With support from IHCDA and the awarded technical assistance provider, the Subgrantee in question will:

- Be placed on a Quality Improvement Plan (QIP). A QIP is prescribed to sub-grantees with a significant number of technical findings and/or program deficiencies. The QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and fully participating in monthly monitoring visits.
- IHCDA also may implement a modified QIP. A modified QIP is prescribed to sub-grantees with less dire, but still numerous, findings and concerns. The modified QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and quarterly monitoring visits.

If the QIP does not result in the correction of all issues in question, IHCDA has the option to either extend the QIP period or remove the Weatherization Assistance Program from the sub-grantee. If the State chooses to remove the weatherization program from the sub-grantee, IHCDA will go through the following actions to ensure continued service in the sub-grantee's service area:

- Removal of the program from the sub-grantee will typically not be done until a suitable organization can be found to administer the program, either on a temporary or permanent basis. Under certain circumstances, it may be necessary to remove the Weatherization Assistance Program (WAP) from a sub-grantee immediately if the territory is not being serviced by the sub-grantee, or if a sub-grantee is not operating under an active Weatherization Assistance Program (WAP) contract. Under these conditions, IHCDA will follow the Request for Qualifications (RFQ) and Request for Proposals (RFP) processes outlined below immediately following this process.
- If funding is removed in part from a particular sub-grantee, IHCDA will exercise discretion in either redistributing that funding to existing sub-grantees or new sub-grantee(s) using the RFP method identified below, or awarding funding to those sub-grantees meeting qualifications under 440.15(a) and are capable of handling additional funds, as evidenced by their grant spending in conjunction with production benchmarks.

6.2 Allocations

Federal Allocation

DOE and LIHEAP allocations are distributed using the census-based allocation formula.

- 95% or more of the prior grant cycle contract total must have been expended.
- Final Closeout Reports must be submitted and approved within 45 days after the grant cycle ends. IHCDA DMS, IWAP Quarterly, Job Expense and sub-grantee Closeout Report must match exactly when final claims are processed including all line items and averages.
- When available, a 15% average energy savings as determined by realized energy analysis of local sub-grantee production.
- Sub-grantee must meet the 45-day requirement for vendor and subcontractor payments.

Reallocation of Funds

Sub-grantees failing to meet quarterly as detailed on their most recent budget form may be subject to funding allocation reduction or redistribution at IHCDA's discretion. Any reallocation will be to ensure proper utilization of Weatherization funds throughout the program year.

Sub-grantees eligible for redistributed funds will be determined based on, but not limited to, the following criteria:

- Current level of expenditures for all active weatherization related programs
- Timely and accurate submission of claims
- QIP, MQIP, or Tiered funding status
- Achieved quarterly benchmarks
- Financial and program management capacity

IHCDA will desktop monitor sub-grantee production, expenditure rates, and average cost per unit throughout the life of each DOE and LIHEAP funds. This desktop monitoring will occur in accordance with the funding benchmarks as established by the sub-grantee on the appropriate DOE or LIHEAP budget form. In cooperation with meeting production and expenditure benchmarks, sub-grantees must maintain the appropriate ACPU of each DOE and LIHEAP funds.

This will include a comparison of production as recorded in IWAP and the amount of grant funds claimed through IHCDAOnline. This will be used to track whether or not sub-grantees are maintaining the proper ACPU for DOE and LIHEAP. Please refer to the IHCDA grant agreements, Appendices of Budget Definitions for additional guidance regarding the average cost per unit and for the administration of Weatherization grant funds.

Distribution of Carryover Funding

Sub-grantees on a QIP, MQIP, Tiered Funding or failing to utilize 90% of the last closed out award may not be eligible to receive carryover funding. Carryover funds will be distributed to eligible sub-grantees based on the approved allocation formula.

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Request for Additional Funds

Sub-grantees may request additional funding. In the case that a request is made, the sub-grantee must send in the request via letterhead to ivx@ihcda.in.gov.

Tiered Allocation

Sub-grantees which have failed to meet program expenditure benchmarks, are experiencing financial difficulty, or appear to have a lack of proper programmatic oversight may be placed on a tiered allocation. While on a tiered allocation, sub-grantees must expend funds according to a structured schedule. The performance benchmarks or expenditure percentages, when possible, are based on the sub-grantee's performance in prior years. Failure to meet expenditure benchmarks may result in a reduction of funding. Tiered allocation may be included as part of the sub-grantee grant agreement, when applicable. Sub-grantees placed on a tiered allocation may be subject to an increased level of claim review.

Reduction of Funds

A reduction in funding may occur if IHCDA deems it necessary, or if a sub-grantee:

- Voluntarily returns one or more counties within its service territory
- Returns substantial amounts of allocated funds
- Fails to complete a QIP or MQIP within two consecutive program years
- Fails to meet the expenditure and/or benchmarks
- Experiences financial or programmatic challenges

Request for Qualifications and Request for Proposals

IHCDA may post a Request for Qualifications (RFQ) or Request for Proposals (RFP) to identify organizations suitable to provide services within a particular service territory. The RFQ/RFP is designed to increase the service capacity of that territory and to provide additional service opportunities for program beneficiaries. A sub-grantee will be notified if an RFQ/RFP is posted within its service territory.

The goal is to find the most qualified service provider within a territory. It is important to note that RFQ/RFP are open to the general public, as well as current sub-grantees. Eligible applicants will be determined based on the Federal regulations for the WAP. IHCDA will make a reasonable effort to assess if there is an adjacent, existing sub-grantee to support service delivery. Sub-grantees are encouraged to seek assistance from other sub-grantees who have the capacity to provide support. This step could result in avoiding the need for the RFQ/RFP process. RFQ/RFP will be issued as IHCDA deems necessary. The RFQ/RFP may also be posted for the following reasons including, but not limited to:

- The sub-grantee has been on a QIP/MQIP for more than two consecutive program years
- Failure to meet expenditure benchmarks for more than two consecutive program years
- Sub-grantee continues to demonstrate program deficiencies found during monitoring
- Sub-grantee voluntarily forfeits one or more counties within its service territory
- IHCDA has removed one or more counties from a sub-grantee due to performance issues
- Sub-grantee is involuntarily removed from a particular area due to fraudulent or major misappropriation of funds; legal action has been taken against the sub-grantee, or the sub-grantee dissolves
- The territory is not being serviced by the sub-grantee
- Sub-grantee is not currently operating under an active WAP contract

Like RFQs, the goal of the RFP is to find the most qualified service provider within a prescribed service territory. Therefore, it is important to note that RFPs are open to the general public as well as the community action network. Eligible applicants will be determined based upon the federal regulations for the program. IHCDA will make a reasonable effort to assess if there is an adjacent, existing sub-grantee to support service delivery. Using an adjacent sub-grantee will be determined on a case by case basis.

Award Closeout

Final Closeout Reports must be submitted and approved within 45 days after the program year ends.

IHCDAOnline (DMS) Claims and sub-grantee Closeout Reports must match exactly when final claims are processed including all line items and average cost per units.

The **Closeout Report** is composed of the following items:

- **Appendix D Closeout Form** for specific Program

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- **IWAP Quarterly Report** for all Quarters (Quarters 1, 2, 3, and 4)
- **IWAP Job Expense Report** for Whole Year (Program Year start date to Program Year end date)
- **Approvals** given by IHCDAs during the Program Year

The Closeout timeline is as follows:

- Day 0: Program Year ends, IHCDAs will provide Appendix D Closeout Form for specific Program
- Day 30: Sub-grantee must either submit a rough draft of the Closeout Report, or email iwx@ihcda.in.gov to inform IHCDAs where they are in the process
- Day 45: Sub-grantee must submit the final draft of the Closeout Report. Sub-grantees that fail to submit after 45 days will be marked as late and may show up on Monitoring Reports.

IHCDAs will **reject** Closeout Reports for the following (but not limited to) reasons:

- IHCDAs Online Claims and Closeout Form's PY Budget and PY Expended do not match
- Closeout Form shows sub-grantee is over on an expenditure (percentage or ACPU)
- Closeout Form does not reflect the Return of Funds
- Closeout Form PY Regular Grant Budget and Expended columns are listed in the PY Carryover Budget and Expended columns, and vice versa
- Closeout Form shows both PY Regular Grant and PY Carryover added together in the same Budget and Expended column
- Quarterly Report and Job Expense Report do not match in units completed
- Quarterly Report, Job Expense Report, and Closeout Form do not match in units completed
- Closeout Form unit completions do not match the "Total Closed" on the IWAP Quarterly Report

Sub-grantee must correct all errors to be counted as complete in the submission of the Closeout Report.

Braiding and Closeout

DOE and LIHEAP work off of different program years, but jobs that braid the two programs may be worked on after the LIHEAP program year ends. The LIHEAP portion of the job must be completed by September 30, and work on the job must be paired with DOE. On March 31, the DOE portion must be completed and the whole job closed. This will require two QCIs, one for the LIHEAP portion and one for the DOE portion.

On the Closeout Form, LIHEAP unit completions must match the "Total Completed" units on the IWAP Quarterly Report for LIHEAP in order to be accepted. The job will remain open until the end of the DOE portion is complete, and must be closed by March 31.

V.3 Priorities

4.1 Client Priorities

All weatherization work must follow Department of Energy rules and regulations unless exceptions are specifically stated in the Policy and Procedures Manual, grant agreement and/or program guidance. Several exceptions are listed in Section 6. Any deviation from DOE guidelines, Indiana Policy and Procedures Manual or the Indiana Weatherization Field Guide SWS-Aligned Edition must have written approval from IHCDAs prior to working on a unit. This approval only applies to the unit the request was made for and must be printed and placed in the client file.

Once eligibility has been determined, the sub-grantee must follow its client priority policy. Each sub-grantee will develop written procedures by which it assigns priority eligible households. The written procedure must be reviewed and approved by IHCDAs and the approval will be verified during monitoring. In accordance with [10 CFR 440.16](#), priority must be given in identifying and providing weatherization assistance to households where one or more of the following exist:

- High energy usage
- High energy burden
- Elderly household member(s) (60 years or over)
- Disabled household member(s)
- Household member(s) under the age of 18

Households that do not meet at least one of the priority categories may only be served if all eligible priority households in the Service Provider's territory have been served. Within the above listed priority, sub-grantees may choose the order in which households are served. Priority systems must be applied equally to both renter and owner-occupied units and applied equitably to all areas of the sub-grantee's territory. As defined by the Department of Energy, DOE, in [10](#)

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[CFR 440.3](#), Definitions, a household with a high energy burden means a low-income household whose residential energy burden (residential expenditures divided by the annual income of that household) exceeds the median level of energy burden for all low-income households in the State.

As defined by DOE’s [WIP Energy Burden](#), the Low-Income Energy Burden (% of income) for Indiana, ranges from 8%-10%, therefore High Energy Burden can be defined as an Energy Burden more than 10%.

Agencies that choose to develop their own methods for prioritizing clients must still adhere to federal regulation [10 CFR 440.16\(b\)](#), develop written procedures, and seek approval of the methodology from IHCDA. Each sub-grantee must develop a client-facing priority policy so that clients are able to understand the selection process. This policy will be reviewed during monitoring

V.4 Climatic Conditions

The climate of Indiana is humid and continental. Summers are typically hot and humid throughout the state, while winters generally range from cool to cold. Precipitation in Indiana is moderate year-round.

Severe weather is common in the state, although there are typically fewer tornado reports in Indiana than in states located in what is known as “Tornado Alley”. Lake effect snowstorms also are common on the southeast shore of Lake Michigan, which is located in an area designated as “the Snowbelt” (source: Indiana Department of Natural Resources). Indiana sub grantees use the following weather stations when completing energy audits:

Indiana Heating and Cooling Degree Days

Station Name	State	City	HDD	CDD
CHICAGIL.WX	IL	Chicago	5408	1306
EVANVLIN.WX	IN	Evansville	4076	1612
FTWAYNIN.WX	IN	Fort Wayne	5519	1041
INDNAPIN.WX	IN	Indianapolis	4914	1320
SOBENDIN.WX	IN	South Bend	5568	1144
LOUIVKY.WX	KY	Louisville	3759	1886
CINCINOH.WX	OH	Cincinnati	4529	1306

Source: NOAA

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

IHCDA will ensure maximum energy savings by making certain that unit weatherized in Indiana receive the highest quality of work. The Indiana Weatherization Program accomplishes this by maintaining highly qualified monitors and a progressive training facility. To ensure that procedures are being properly applied, sub-grantees receive specific technical training along with field visits and enhanced training at the field site.

IHCDA is in the process of developing two field guides for Multi-Family projects. The first field guide will focus on small Multi-Family (5-25 units), and the second field guide will focus on large Multi-Family (26+ units).

Per the procedure allowed by 10 CFR 440.21b and set forth in WPN 19-4 the following materials/audit procedures have been approved for use in Indiana’s program in addition to those allowed by 10 CFR 440 Appendix A:

Table 3 - Special Materials/Audit Procedures Approvals	
Item	Comments
Refrigerators	Approved 1/7/2020
Heat Pump Water Heaters	Approved 1/7/2020
Spray Foam Insulation	Approved 8/18/18
Light Emitting Diode (LED) Lighting	Approved 4/6/17

To meet requirements within [WPN 22-4](#) IHCDA added the following language to their sub-grantee contracts:

Sub-grantees shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Indiana, the Indiana Weatherization Field Guide, the Indiana Weatherization Policy and Procedures Manual, other State Weatherization directives as applicable, and any

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amendments thereto (collectively "State Weatherization Plan and Directives"). Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard Work Specifications (SWS), sub-grantees shall abide by and perform all work in accordance with said document. The sub-grantees's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.

Additional language was added as follows:

Sub-grantees shall ensure that all Weatherization staff and sub-contractors who perform or provide Weatherization services to client units receive and adhere to all standards as outlined in Indiana's Weatherization Field Guide, Indiana's Weatherization Policy and Procedures Manual, the Department of Energy Weatherization Assistance Program State Plan for Indiana and other State Weatherization directives as applicable. Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard Work Specifications (SWS), sub-grantees shall abide by and perform all work in accordance with said document. The sub-grantees' signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client units by them.

IHCDA utilizes the Indiana Weatherization Policy and Procedures Manual and the Indiana Weatherization Field Guide aligned with DOE's Standard Work Specifications to regulate the Weatherization services provided throughout the State of Indiana.

All WAP services provided by Indiana's Weatherization sub-grantees must be performed in compliance with a properly completed NEAT/MHEA/MuTEA run. Additionally, IHCDA will allow use of the new DOE Priority List upon sub-grantees discretion as an alternative to existing auditing procedures. All WAP services must also meet or exceed the expectations of Indiana's field guide/SWS and the requirements of [10 CFR 440, Appendix A](#).

The most recent field guide and variances were approved by the DOE in August 2021. A 5-year renewal will be required by August 2026. The Field Guide also includes information and forms specific to Indiana's WAP.

To help prepare Indiana's Weatherization Network for the implementation of the updated field guide and SWS alignment, INCAA, in conjunction with IHCDA, will utilize Semi-Annual Technical Trainings and Semi-Annual Manager's Meetings to expose the network to the guides and remind them of implementation timelines. In addition to this training, INCAA will also perform T&TA visits to individual sub-grantees to assist them with understanding and using the aligned document.

IHCDA has received DOE approval for Indiana's SWS/Field Guide, IHCDA has made the document available to Indiana's Weatherization Network. Indiana's sub-grantees are required to implement and adhere to the aligned document. The links are also available on IHCDA's website and on the training center's website and identified within the IHCDA Weatherization Policy and Procedures Manual.

Indiana's Weatherization Policy and Procedures Manual and Program Notices contain requirements that sub-grantees follow, among other regulations, Indiana's aligned Field Guide and SWS.

Indiana's Weatherization Policy and Procedures Manual is updated annually at the start of the DOE funding cycle. The major goal in updating the policy manual is to ensure that Indiana's sub-grantees have up-to-date guidance for properly managing Indiana's WAP. IHCDA ensures that the information in the policy manual is consistent with Indiana's aligned Field Guide and SWS as well as DOE, HHS, EPA and HUD guidelines where applicable. The policy manual also contains all required forms utilized within Indiana's WAP. The most recent update of Indiana's Policy and Procedures Manual was completed in January 2023. This updated manual was supplied to Indiana's Weatherization sub-grantees and INCAA as well as being posted on IHCDA's website. IHCDA will highlight the updates to the 2023 manual during two Semi-Annual Manager Meetings (SAMMs) conducted in the spring and fall of 2023.

In addition to the above information, IHCDA regularly encourages their sub-grantees to reference the wealth of Weatherization related knowledge contained on the NASCSP and DOE websites.

IHCDA also considers the training staff at INCAA and the contracted monitor(s) as technical guides and resources. These individuals are available by phone, email, and when possible, local visits. The combined years of Weatherization experience of these individuals make them a valuable resource to Indiana's WAP network.

Field guide types approval dates

Single-Family: 8/4/2021
Manufactured Housing: 8/4/2021
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: NEAT
Approval Date: 12/7/2021

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date: 12/7/2021

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Audit Procedure: Multi-Family

Audit Name:

Approval Date:

Comments

The approved audit dated 12/08/2021 does not apply to Small Multi-Family (5-24 units). Multi-Family projects with 5 units or more will require submittal to DOE for approval prior to weatherization. Some NEAT/MHEA for Multi-Family may be possible, but will require 100% of units receive monitoring. After IHEDA submission and DOE approval, IHEDA will begin use of NEAT for Small Multi-Family (5-24 units) projects.

At the time a multifamily project is considered, the Grantee must submit to the DOE PO the necessary material to approve the multifamily project prior to commencing weatherizing the building (e.g., engineering assessment, energy audit input/output).

DOE Priority List

Prior to any weatherization activities, each eligible unit must undergo a whole-unit energy audit by a trained energy auditor. The Auditor will evaluate the health & safety of a unit and conduct field measurements and diagnostic testing to identify areas for energy savings and enhancements.

The data collected may be used to follow the optional DOE-Sponsored Priority List (PL) for a Single-Family Site-Built Home or Manufactured Home for region 3 (cold) or by performing a NEAT/MHEA audit. Links to PLs:

- [WPN 22-8 Attachment 1: DOE-Sponsored Priority List for Single-Family Site-Built Homes](#)
- [WPN 22-8 Attachment 2: DOE-Sponsored Priority List for Manufactured Homes](#)

The optional PL is not exhaustive and does not include every measure that may be cost effective on a site-specific basis. NEAT/MHEA must be utilized if the unit does not meet the basic requirements of the PL. NEAT/MHEA must be utilized:

1. When there is a need of the unit that is not included within the PL.
2. When there are more than 3 stories in height above grade.
3. When the primary heating system is:
 - a. a sealed-combustion natural gas furnace originally rated for >90% AFUE.
 - b. a heat pump manufactured after 2006.
4. When the Job will exceed \$500 in incidental repairs meeting the definition outlined in WAP WPN 19-5.
5. When an auditor is unsure how to prioritize measures needed in a unit based upon budget constraints.

When utilizing the PL subgrantees are required to perform all applicable measures noted as mandatory on the PL.

Whether a sub-grantee is using NEAT/MHEA or the PL, all forms listed in section 3.2 Required Forms are required to be complete when applicable and in the file for every unit. This includes the Quality Control Inspection Form. All units are required to receive a quality control inspection by a BPI Quality Control Inspector, as outlined in the Section 7 and WPN 22-4. All quality control inspections must be performed in accordance with 10 CFR 440.16(g) and WAP Memorandum 010. See 4.2 Overview of Weatherization Activities-Quality Control Inspections for minimum requirements.

Indiana's Audit Procedures

Subgrantee auditors conduct a whole-home audit and work is completed based on what the results of the audit specify is required to make the unit more energy efficient. All units being weatherized are treated with the whole-home system approach, with the goal of aligning thermal and pressure boundaries on every unit. Additionally, as part of the whole unit audit, extensive testing of combustion appliances is conducted to ensure client and worker health and safety. After the initial audit is completed, Subgrantee crews or contractors may then complete the weatherization work based on a site specific audit using NEAT/MHEA/MulTEA.

The use of a NEAT/MHEA/MulTEA audit ensures that all completed work meets DOE and IHEDA expectations for quality and effectiveness. Beginning April 1, 2021, sub-grantees must complete NEAT/MHEA/MulTEA audits on 100% of units, except when using DOE's Priority List.

Incidental Repairs

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In NEAT/MHEA/MulTEA, (following DOE guidance) an Incidental Repair Measure (IRM) needs to be associated legitimately with an Energy Conservation Measure (ECM). The cost for the IRM is not tied to the Savings to Investment Ratio (SIR) for that ECM but is included in the calculation for the overall job SIR. An IRM or multiple IRMs may be performed as long as the overall job SIR is 1 or greater.

The energy audit approval dated 12/08/2021 applies specifically to small multi-family buildings (**between 2-4 units**) which have individually heated, cooled domestic hot water (DHW) systems using NEAT. Buildings beyond that scope are handled on a case-by-case basis and require MulTEA to be used to perform the audit.

Pursuant to [5 USC 552\(b\)\(6\)](#) of the Freedom of Information Act, Subgrantees eligible to participate in utility programs, or participate in a state or regional-level study, are required to keep confidential any specifically identifying information related to an individual's eligibility application for WAP, or the individual's participation in WAP, such as their name, address, or income information. IHCD and Subgrantee States may release information about recipients in the aggregate and which does not identify specific individuals (For example, information on the number of recipients in a county, city or a zip code does not compromise the privacy of the recipients). Subgrantees interested in participating in utility programs or studies must submit requests to IHCD for approval before entering into any third-party agreements.

Timeline

4/2021: Grantee required all sub-grantee utilized NEAT/MHEA/MulTEA on 100% of all energy audits. INCAA training center will continue to provide 2-day NEAT/MHEA/MulTEA course as well as needed TTA per request of sub-grantees and as recommended as a result of IHCD recommended monitoring recommendations/requirement.

4/2022: IHCD 2022 State Plan and Policy Manual requires all sub-grantees to utilize the web based version of the energy modeling software prior to 4/1/2024. IHCD monitoring will add a monitoring inspection point to the 4/2024 monitoring checklist to ensure compliance by all sub-grantees.

INCAA training center will continue to maintain relationship and contact with ORNL as needed.

These dates are subject to change based on actual timeline vs proposed timeline as outlined in [WAP Memorandum 091](#).

3/2023: INCAA training team leader will connect with Oakridge National Laboratory energy modeling software team regarding training for the online platform.

3/2023: IHCD and INCAA staff will develop curriculum specifically to the new web-based version of NEAT/MHEA. Once the release is made, the team will meet to review and discuss the Conversion Curriculum to be available in PY 2023.

3/2023: INCAA training team will add 2-8 (or more as necessary) events for sub-grantees required web-based training migration.

4/2023: INCAA training will continue to offer periodic 2 day NEAT/MHEA/MulTEA course as needed and as requested, indefinitely. INCAA training and IHCD monitoring will continue to provide one-on-one TTA as recommended, requested, or required, indefinitely.

11/2023: IHCD and INCAA staff will attend Train-the-Trainer event; IHCD will release memorandum to sub-grantees stating requirement for all energy auditors, quality control inspectors, and Wx Program Managers to attend online platform training prior to 4/1/2024.

V.5.3 Final Inspection

Each sub-grantee, or its authorized representative, is required to complete a pre- and post-inspection of each unit weatherized.

4.2 Overview of Weatherization Activities

Initial Audits

Prior to any weatherization activities, each eligible unit must undergo a whole-home audit by a trained energy auditor (as defined in Section 7). Audits are conducted according to the DOE-approved NEAT/MHEA/MulTEA audit.

Interim Inspections

An Interim Inspection is required on all units, except 100% electric without fireplaces. The purpose is to evaluate work performed on the mechanical systems to evaluate all health and safety issues that could be created or made worse by Weatherization measures. Interim inspections must be performed by an Energy Auditor, Quality Control Inspector, Retrofit Installer Mechanical, or HVAC Professional. IHCD prohibits anyone inspecting their own work that results in payment from the sub-grantee. Interim inspector must complete, sign, and date the appropriate form(s). Additionally, the interim inspector must include applicable notes and notate if the inspection passes or fails. If work cannot be inspected within 45 days of invoice, an interim inspection must be performed to verify that the heating work is done correctly ensuring payment can meet per the required 45-day deadline.

Final Inspection

The Program State monitor evaluates the NEAT/MHEA runs for all files reviewed. The Program Monitor also reviews the NEAT/MHEA database. This review includes fuel cost, measures cost against the current pricelist, setpoints, lifetime of the measures, and that the proper measures are checked "active" as required.

Quality Control Inspections

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IHCDA's weatherization program requires all weatherization work be verified by a Quality Control Inspector (QCI) or an interim inspection before invoices are approved. This is verified during monitoring by checking the date on the inspection forms with the date on the payment. As mentioned by OCS, this is a requirement by IHCDA, and payment after inspection is verified during annual Program monitoring.

Per [WPN 22-4](#), all completed units are required to receive an inspection by a BPI Quality Control Inspector. All quality control inspections must be performed in accordance with [10 CFR 440.16\(g\)](#) and [WAP Memorandum 010](#). If Quality Control Inspectors are found to be out of compliance, remedial training may be required for the QCI, contractor, and/or sub-grantee staff. The minimum requirements are:

- All applicable forms signed by QC inspector (with name printed also).
- Date the QC inspection was completed
- Sign off by the QC inspector verifying the scope of work and it is in the file.
- Identify corrections necessary (and full cycle of verification).
- Review/verify all appropriate measures were on work order
- Identify/verify documentation and justification for any measures not installed are in the file
- Diagnostics at Inspection
- Sign off by the QC inspector verifying bid(s) against invoices; audit cost inputs against invoice actuals and make note of any areas where there is deviation from bid/audit input
- Client Signature – sign off the work was accomplished

- All materials have been properly installed

If a unit cannot be entered for QC inspection, the client file must contain documentation clearly stating the reason the QC inspection could not be completed. A Provisional Closeout may be approved by IHCDA. In order to receive a Provisional Closeout, the following must be documented in the client file:

- Three verifiable attempts must be made to schedule a QC inspection (one attempt must be a certified letter). Certified Letter to client should include:
 - Documentation of missed scheduled appointments by the client and/or the client refusal to allow entry to complete final work or perform an inspection.
 - Language stating that the client will have a minimum of seven working days to contact the sub-grantee to allow re-entry to complete work and/or the QC Inspection
 - Consequence of not responding within the 7-day period: all warranty and liability associated with materials installed and work performed will be forfeited whereas the client releases the State of Indiana, the Indiana Housing and Community Development Authority, and the Weatherization Administrator its agents and employees from any and all liability for losses, damages, costs, personal injury, death, or other claims because of or in relation to the installation, location, or malfunction of measures performed
 - Client's right to appeal the consequence in writing to IHCDA within ten (10) business days of receipt of letter. A letter or email must be sent to IHCDA, attention of the Director of Community Programs, 30 South Meridian Street, Suite 900, Indianapolis IN, 46204
- The request should detail the specific circumstances related to the issue and why access to the unit has been denied or is unavailable
- All appropriate documentation, including communication with the client, should be included with the request

Units approved for a Provisional Closeout will not be allowed to be counted as a completion. However, costs can be spread across grant completions and claimed to IHCDA. IHCDA will respond in writing to approve or deny the request for a Provisional Closeout or to request additional information. Until the written approval from IHCDA is received, final claims cannot be submitted for the unit.

Client Refusal to Sign

Units that have had a QCI conducted but the client refuses to sign off on the work, the unit can be counted as a completion upon approval by IHCDA. In order for IHCDA to consider the unit a completion, sub-grantees must send the entire client file with personal identifying information (PII) redacted and a detailed explanation regarding client refusal to sign to lwax@ihcda.in.gov. It is recommended that Weatherization sub-grantees, whenever possible, complete the QC inspection process on the last day that contractors or crews will be in the unit, as this eliminates the need to gain access to the unit after services have been rendered.

Failed Quality Control Inspection

If a QC Inspector and a sub-grantee cannot come to a mutual agreement regarding a failed QC inspection, a neutral third party QCI must be utilized to make the determination. A neutral third party QCI cannot be an employee of the sub-grantee. The QCI could be from another subgrantee or subcontractor.

8.5 Monitoring Reporting Process

Monitoring Appeals Process

If the sub-grantee informally appeals (disagrees with) any item on the WAP Monitoring Report, the sub-grantee must send an informal appeal via email to IHCDA's Program Monitor within 10 days of the receipt of the monitoring report.

- IHCDA will respond within 10 days of receipt of sub-grantee's Informal Appeal to the Monitoring Report.
 - If IHCDA **agrees** with all items identified in the sub-grantee's **Informal Appeal**, the sub-grantee will receive a revised monitoring report that will be used to ensure all actionable items are completed.

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- If IHCDA **does not agree** (in-full or in-part) with the sub-grantee's **Informal Appeal**, the sub-grantee will receive an **IHCDA Informal Appeal reply**.
- The sub-grantee will provide a **second response** within 10 days. (If applicable)
 - If the sub-grantee **agrees** with the reasons described for not changing items identified in the informal appeal, the sub-grantee's second response is to be sent to the IHCDA.
 - If the sub-grantee **disagrees** (in-full or in-part) with IHCDA's **Informal Appeal** response, the sub-grantee may submit a **Formal Appeal** in writing to the Director of Community Programs. The Director of Community Programs will review the formal appeal and provide a written decision within 30 days. This decision will be final.

Following [WPN 22-4](#), every completed unit in Indiana must be inspected by a BPI Certified Quality Control Inspector.

IHCDA ensures compliance with [10 CFR 440.16\(g\)](#) and [WPN 22-4](#) by monitoring at least 10% of client files and at least 5% of units completed by each Subgrantee to adjust for QCI/auditor combo.

IHCDA will allow two options for meeting the Quality Control Inspection requirement. Sub-grantees must apply to IHCDA in order to be able to utilize the Energy Auditor as the QCI option, and must indicate their intended method to IHCDA for consideration. Sub-grantees that are unable to meet the deadline, or do not submit a plan to IHCDA will be required to utilize an Independent QCI.

Independent QCI

The QCI is an individual that has no involvement in the prior work on the unit, either as the auditor or as a member of the crew. If this method is utilized, IHCDA will monitor a minimum of 5% of DOE completions.

Energy Auditor/QCI

- A. The auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the unit. Because this model does not allow for an independent review of the audit on every unit, IHCDA is required to increase the percentage of quality assurance reviews to ensure that audits are being performed consistently and correctly. IHCDA will monitor a minimum of 10% of DOE completions.
- B. Inspectors shall not participate in professional activities involving a conflict of interest. A conflict of interest occurs when an inspector is inappropriately motivated by any financial, personal, or professional incentive other than the production of a professional report that clearly, completely, and usefully reflects the conditions observed during the audit. Inspectors shall avoid, whenever possible, even the appearance of a conflict of interest and shall disclose all potentially questionable associations and relationships in advance to IHCDA.
- C. Inspectors shall not inspect work performed by organizations under arrangements whereby any compensation or future referrals to the inspector depend on or are influenced by the findings of the report. Compensation includes direct and indirect remuneration as well as substantial gifts and favors. Inspectors shall not accept any form of compensation for recommending products or services to clients or other parties having an interest in the inspected work.
- D. Additional documentation may be required by IHCDA if necessary, including:
 - Documentation of the independent status of the Quality Control Inspector
 - Documentation outlining any involvement of the QCI in the audit process
- E. Quality control inspections are subject to IHCDA assessment of effectiveness and compliance with program inspection policies and monitoring will include documentation of any findings related to the quality of the inspection and impartiality of the inspection process.
- F. IHCDA will maintain tracking of all sub-grantee QCI activities to include all aspects of the sub-grantee-developed QCI process, subsequent corrective actions, and final outcomes. The QCI auditor cannot be the manager.
- G. If QCIs are found to be out of compliance, remedial training may be required for the QCI, the installation contractor, and/or sub-grantee staff. Limited remedial training may be provided by IHCDA staff on-site at the time of the monitoring, or more extensively through the training facility at INCAA if necessary. Alternatively, IHCDA staff may provide more comprehensive training at a later date. Repeated non-compliance issues after remedial training may result in the agency being placed on QIP, or a reduction in funding. All compliance issues found with QCIs are subject to IHCDA review, and may result in the QCI not allowed to perform inspections for Indiana WAP.
- H. Sub-grantees may not be considered if one or more of the following program deficiencies are identified:
 - General Administrative Deficiencies that include late interim or closeout reports, late completion reporting (data entry), lack of procurement policies, outdated cost allocation plans.
 - Fiscal Reporting issues that include failure to claim expenses on a monthly basis, repeated occurrences where expenses are submitted more than 45 days after the invoice or purchase order date, contractors paid beyond the 45 day requirement.
 - Staff or contractors fail to receive proper certifications.
 - Average cost per unit exceeds cost guidelines set forth by DOE or HHS (LIHEAP) funding.
 - At least 25 percent of client files reviewed are deemed ineligible.
 - High risk outcome on the Risk Assessment.

Sub-grantees are required to ensure that each weatherization completion receives an appropriate and properly executed final inspection. This inspection must be performed by a BPI-certified Quality Control Inspector (QCI). IHCDA, as part of their regular monitoring procedures, will review final inspection forms, sub-grantee inspection processes and completed units to ensure the inspections are being performed correctly and in a manner that meets DOE expectations as outlined in [WPN 22-4](#). Failure by the sub-grantee to utilize the QCI process correctly may result in the associated completion(s) being considered unallowable, and all associated cost being returned to IHCDA. Should multiple instances of poorly performed inspections be found, IHCDA will, at the very minimum, place the sub-grantee on a Quality Improvement Plan (QIP). Should the QIP fail to correct the issues, IHCDA will pursue further remedies for noncompliance as allowed in their Weatherization Policy and Procedures Manual and the sub-grantee grant agreement (contract).

Units that have had a QCI conducted but the client has not signed off on the work, as long as three verifiable attempts have been made and recorded, that unit can be counted as a

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completion, upon approval by IHCDCA.

Terms and Conditions for Return of Funds in Monitoring

A return of funds transaction is initiated when paid grant funds need to be returned due to a monitoring or financial audit issue. A return of funds must be paid out of private agency funds. These funds will show on the claim summary but will not be returned to the sub-grantee's available budget. The state will reuse these funds in future allocations.

Some examples of disallowed costs might include, but are not limited to:

- Exceeding 25% of total expended funds on Health & Safety measures.
- Exceeding the current average cost per unit.
- Interest expenses paid with DOE funds.
- Rework expenses except when specifically authorized by IHCDCA.
- Disallowed equipment and vehicle purchases with DOE funds.
- Any measure not cost-justified.
- Any repair that exceeds the incidental repair measure limit for materials and labor.
- Expenditures incurred for the installation of measures on a completed unit outside of the client's eligibility period.
- Expenditures incurred for the installation of measures on a completed unit outside the contract period.
- If IHCDCA cannot determine an expenditure is allowable because of inadequate records or documentation, IHCDCA will request documentation. If documentation cannot be produced, the costs will be disallowed.

Sub-grantees are required to correct any deficient work identified by the Quality Control Inspector before the work is submitted for reimbursement. As a result of technical monitoring inspections, sub-grantees with incomplete work and workmanship issues will be allowed to rectify the problem before disallowances are levied. Sub-grantees will be asked to reverse or repay costs that are determined to be unallowable. If questioned costs are significant, an investigation may be performed, and the sub-grantee may be subject to additional review.

When deficiencies are identified, sub-grantees may be required to submit a corrective action plan within 30 days of receipt of the Technical Monitoring Report. The submission must include a description of the corrective actions to be taken as well as a timeline for implementation of those actions. The Corrective Action Plan will be submitted to IHCDCA's Program Manager for review and approval.

When deficiencies persist, IHCDCA may take any of the following actions: place the agency on a Quality Improvement Plan, designate the sub-grantee as high-risk, place the sub-grantee on a watch list, or suspend the sub-grantee's weatherization program in response to recurring major findings or persistent noncompliance with IHCDCA and/or DOE WAP policy.

A sub-grantee may appeal a return of funds or repayment following the monitoring appeals policy. Until further notice, all return of funds and repayments will be considered by the Director of Community Programs before being issued to sub-grantees.

IHCDCA, in cooperation with INCAA developed a standardized final inspection form to be used by Indiana's sub-grantees and technical monitor. IHCDCA has attached a copy of this QCI form to the SF-424. To meet the Quality Control Inspector (QCI) requirement as outlined in [WPN 22-4](#) Indiana currently has 65 certified QCIs in place. All 21 of Indiana's sub-grantees either have a certified QCI on staff, or have made contractual arrangements to meet the requirements outlined in [WPN 22-4](#). IHCDCA will continue to provide testing opportunities within INCAA's Technical and Training Assistance contract to provide an ongoing opportunity for ongoing QCI testing. IHCDCA hopes to continue adding QCI certified individuals throughout the 2023 Program Year.

In addition to the QCIs mentioned above, three trainers from INCAA have achieved the QCI certification.

Currently, IHCDCA only pays for the first QCI testing attempt. If the candidate fails the first attempt the subsequent attempts are paid for either by the sub-grantee or the contractor. To facilitate the additional testing, INCAA incorporates test dates within their training schedule.

IHCDCA's Weatherization sub-grantees are required to track and document all training and certifications of both Weatherization staff and sub-contractors. IHCDCA reviews this information during monitoring to ensure that all requirements are being met. Tracking the QCI certifications and qualifications at each sub-grantee is a part of this monitoring process.

Indiana, in cooperation with INCAA, provides the opportunity for individuals to test for DOE's national Energy Auditor Certification through BPI. IHCDCA is encouraging their network to test for this certification. Indiana currently has thirty-four (34) individuals who have successfully obtained the DOE/BPI Energy Auditor Certification.

V.6 Weatherization Analysis of Effectiveness

Starting in 2010, IHCDCA and INCAA transitioned their method of assessment of weatherization effectiveness from Princeton Score keeping Method (PRISM) to work in conjunction with the Building Energy Analysis of Consumption (BEACon) system. This combination allows IHCDCA to review a larger selection of units for energy efficiency improvements, produces better electric savings information, and cuts down on administration costs in the long run since information can be gathered electronically. The BEACon reports were sent to each sub-grantee for them to review and use to measure their energy savings progress. Additionally, training was provided to the Indiana Weatherization Network during INCAA's annual CAP conference in July 2019. This training taught the attendees how to read and use these reports.

When available, the reports generated by the BEACon system provide results that are both based upon state wide averages as well as individual sub-grantees. These results are shared with each sub-grantee so that they know how they are performing. The information not only provides overall energy savings but provides indicators as to how each energy

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auditor, crew and contractor are performing. IHCDCA strongly encourages each sub-grantee to utilize the information as a tool to identify where program improvements are needed.

IHCDCA reviews the reports generated by the BEACON system to assess incentive pool participation, to gauge performance of sub-grantees in relation to energy savings, to gauge success of Indiana's WAP as a whole and project future needs.

Indiana may opt to utilize an incentive pool process in conjunction with issuing funding allocations that promotes energy savings and sound program management. DOE and LIHEAP allocations are distributed using the census-based allocation formula for 85% of Weatherization sub-grantees contracted funds. The remaining 15% of the allocation is distributed out to those Weatherization sub-grantees who meet all of the following criteria:

1. 95% or more of the prior program year contract total must have been expended.
2. Close Out Reports must be submitted and approved on time (within 45 days after the program year ends). IHCDCA DMS, IWAP Quarterly, Job Expense and sub-grantee Close Out report must match exactly when final claims are processed, with all line items and averages being within allowable limits.
3. A 20% average energy savings as determined by PRISM/BEACON analysis of local sub-grantee production.
4. No Weatherization sub-grantee operating under a 120-day or modified Quality Improvement Plan (QIP) will be included in the incentive pool.
5. Weatherization sub-grantees must demonstrate regular use of the XRF for lead based paint testing.
6. Sub-grantee must meet the 45 day requirement for vendor and sub-contractor payments.

Sub-grantee Effectiveness:

To assess sub-grantees' procedural effectiveness, IHCDCA monitors use a combination of monitoring and T&TA. Sub-grantees with deficiencies may be required to attend training specific to the sub-grantee's needs. Sub-grantee deficiencies and subsequent training include but are not limited to: lack of managerial oversight, inadequate technical, fiscal and database management, and client education procedures.

In addition, IHCDCA and sub-grantee personnel continuously evaluate the effectiveness of training provided through IHCDCA and the technical assistance provider's (INCAA) training program. This is done through a combination of monitoring of sub-grantees, feedback at Semi-Annual Managers Meetings, and meetings with Indiana's Weatherization Training Center (INCAA).

IHCDCA reviews all reports prepared by the monitor(s) and IHCDCA's contracted monitoring team prior to monitoring reports being sent to the sub-grantees. This review allows IHCDCA to stay current on the issues being faced by each sub-grantee and work toward resolution of problem or weak areas. IHCDCA performs risk assessments on each sub-grantee in alignment with [2 CFR 200](#) in order to improve areas of weakness.

V.7 Health and Safety

Please see the attachment **2023** Indiana Health and Safety Plan, which is in the Optional Template format. Guidance from [WPN 22-7](#) is addressed therein.

The Health and Safety expenditures are limited to **25%** of Indiana's average cost per unit (ACPU) resulting in a Health and Safety allowable average of **\$2,000.00** per unit.

Repairs on one measure over \$1,200.00 are considered major repairs.

V.8 Program Management

V.8.1 Overview and Organization

The Indiana Weatherization Assistance Program is administered by the Indiana Housing and Community Development Authority (IHCDCA). IHCDCA is a quasi-governmental agency that administers numerous programs including the Low-Income Housing Tax Credit program, First-Time Home Buyer Assistance, Community Development Block Grant, HOME Investment Partnership funds, Emergency Shelter Grant, Low-Income Household Energy Assistance Program, Community Services Block Grant, and Neighborhood Stabilization Program, among others. IHCDCA is located within the Family of Business of the Indiana Lieutenant Governor's Office. IHCDCA is located in Indianapolis, IN.

IHCDCA staff responsible for the oversight of the Weatherization Assistance Program in Indiana

- Kyleen Welling – Chief of Staff and Chief Operating Officer
- Emily Krauser – Chief Deputy of Programs
- Greg Glassley – Director of Energy & Utility Programs
- Josh Pearson – Weatherization Technical & Policy Analyst
- Joely Pope – Energy & Utility Programs Special Projects Manager

The primary point of contact for Indiana's WAP is Greg Glassley.

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IHCDA utilizes the Indiana Community Action Association (INCAA) as the Weatherization Training Center for Indiana. INCAA is IREC accredited in all four of DOE's Job Task Analyses and has three IREC Certified Master Trainers. INCAA is located in Indianapolis, IN.

Hutson Homes will provide programmatic monitoring for 15 sub-grantees, and Streamlined Solutions will provide programmatic monitoring for 5 sub-grantees in the grant cycle. IHCDA will review reports before they are distributed to Subgrantees.

Rob Durham, of The Inspector Inc. has provided technical monitoring for all twenty (20) Weatherization Subgrantees in grant cycle. Rob Durham will continue to perform the technical monitoring in grant cycle. IHCDA will review reports before they are distributed to Subgrantees.

Indiana utilizes twenty (20) sub-grantees to administer the Weatherization Assistance Program (WAP). Nineteen (19) sub-grantees are Community Action Agencies; one (1), JobSource, (DBA CICAP) is a unit of local government.

Indiana plans to develop incentives to encourage minority and women owned businesses to be involved with the Weatherization program.

V.8.2 Administrative Expenditure Limits

Indiana's Weatherization Policy and Procedures Manual addresses the administrative limits for DOE funds as follows:

Administration – Actual costs, associated with administration include *fiscal, executive, support operations, rent and utilities, supplies, copying, etc.* This applies to staff engaged in program administration.

Indiana's sub-grantees may spend up to 10% of their total non-TTA award on administrative costs for **PY 2023-2024**. IHCDA will retain 4.5% for Grantee use.

V.8.3 Monitoring Activities

8.1 Quality Assurance

The primary purpose of monitoring visits is to assist the Weatherization sub-grantee in providing high quality energy conservation services to low-income people. Monitoring also provides compliance review and information sharing to Weatherization sub-grantees to ensure:

- Quality, comprehensive weatherization services are provided consistently throughout the state
- Healthy, safe, and energy efficient housing improvements are provided to low-income households
- Program accountability and efficiencies are in effect and verifiable
- Federal, State and IHCDA standards and regulations are followed

8.2 Standards & Practices

IHCDA will conduct fiscal, technical, file, and program monitoring annually. IHCDA will review reports before they are distributed to sub-grantees. **When corrective action is taken, sub-grantees will submit monthly reports until issues are resolved by the time of their next annual monitoring session.**

Program Monitoring

The program monitoring includes a review of Program Administration, Procurement, Training, Competencies and Certifications, Database Input, Fiscal Information and Client File Review. At least 10% of completed DOE client files will be reviewed. Each area of the Program Review is explained in more detail below:

- **Program Administration** – IHCDA will review agency policies as they apply to awarding priority, wait list maintenance, rental policies, and client redetermination.
- **NEAT/MHEA/MulTEA Database reviews will include the following**
 - Price list is up to date and current
 - Fuel prices are current
 - Set points are accurate
 - Lifetime of measures are correct
 - Measures are active
- **Procurement** – This section covers materials procurement and selection; contractor selection procurement, and evaluation; price lists and written procurement standards. Reference the procurement section in this manual for additional information.
- **Training, Competency and Certification** - IHCDA monitors will review whether the Weatherization Program Manager is using appropriately trained/competent staff to

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perform various job functions. The use of subcontractors will be reviewed to determine compliance with job function training requirements as outlined in this manual. Monitors will also review contractors for compliance with local licensing standards. Sub-grantee lead based paint practices and compliance with EPA and HUD regulations will also be reviewed.

- **Database Input** – A selection of the client files are checked to ensure information from the client files is reported in the IWAP database accurately and completely.
- **Fiscal** – IHCDCA will perform financial monitoring for their Weatherization sub-grantees. The financial monitoring will occur in conjunction with the Weatherization Program/File Monitoring. IHCDCA will check for appropriate payment processing as specified in this manual. The monitor will review the following:
 - Grant utilization to ensure funding is utilized in allowable combinations
 - Sub-grantees have properly tracked and utilized Program Income
 - Contractors are paid within 45 days
 - Back-up documentation provided with claims is appropriate
- **Client File Review** – Files will be pulled at random from completions entered into the IWAP database. A minimum of 10% of all completed DOE client files will be reviewed. Find Program Monitoring Tool utilized by monitors can be found at MyIHCDCA's [Program Partners](#). *Appendix F - Monitoring Tool 2023-2024 template*. These files will be reviewed for:
 - Correct forms
 - Accurate information
 - Work processes
 - Eligibility verification
 - Appropriate documentation and allowability of deferrals
 - Each NEAT/MHEA/MulTEA run is checked to verify the cumulative SIR is equal or greater than 1
- **Training and Technical Assistance (T&TA)** – The purpose of T&TA is to provide sub-grantees with assistance in the technical aspects of the weatherization program. IHCDCA monitors will provide consultation while on site. If sub-grantee personnel feel it necessary, and time allows, IHCDCA monitoring personnel may be available for T&TA visits to the sub-grantee.

Technical Monitoring

IHCDCA will perform real-time Technical Monitoring for each Weatherization sub-grantee annually. The purpose of this monitoring is to ensure that weatherization services are provided in a professional manner in compliance with all standards, regulations and policies set forth by DOE, HHS and IHCDCA. The sub-grantee is responsible for quality control on all completed units and must ensure that the QC inspection completed by the QCI attests to the level of quality, professionalism, and appropriateness of all measures performed. Technical Monitoring will also review and inspect invoiced materials, justification for the number of labor hours charged, initial and final audit detail, and adherence to technical standards and accuracy of sub-grantee diagnostic testing.

Monitors will use the current QC Inspection Form. A minimum of 5% of all DOE completed units will be monitored for those sub-grantees utilizing an Independent QCI, and a minimum of 10% of all DOE completed units will be monitored for those sub-grantees with an Energy Auditor/QCI. IHCDCA reserves the right to monitor any unit including Capital Intensive unit(s). Sub-grantee responses to technical findings must include documentation verifying that all findings and concerns have been corrected. IHCDCA when possible, will incorporate in-progress visits to client units. IHCDCA's Technical Monitoring visits will include an evaluation of the QCI's process to ensure compliance with [WPN 22-4](#).

Sub-grantees are required to ensure that each Weatherization completion receives an appropriate and properly executed QC inspection. This inspection will be performed by a BPI certified QCI. Failure by the sub-grantee to utilize the QCI process correctly may result in the affected completion(s) being considered unallowable and all associated cost being returned to IHCDCA. Should multiple instances of poorly performed inspections be found, IHCDCA will, at the very minimum, place the sub-grantee on a Quality Improvement Plan (QIP). Further action will be taken should the QIP fail to improve performance.

- **Field Inspections** (See Technical Monitoring below) – IHCDCA will conduct on-site inspections of a sample of units pulled from the file review or at random from the IWAP database. The purpose of this monitoring is to ensure that weatherization services are provided in a professional manner in compliance with all standards, regulations and policies set forth by DOE, HHS and IHCDCA. The local sub-grantee is responsible for quality control on all completed units and must ensure that the QC inspection completed by the BPI certified Quality Control Inspector (QCI) attests to the level of quality, professionalism, and appropriateness of all measures performed. The field inspection will cover the appropriateness of Base Load, Shell, and Health and Safety measures. During the field inspection, IHCDCA staff will be checking for all invoiced materials, justification for the number of labor hours charged, initial and final audit detail, adherence to technical standards, and accuracy of sub-grantee diagnostic testing.

8.3 Monitoring Process

IHCDCA staff and contracted monitors prepare the monitoring schedule and contact each sub-grantee to schedule the appointments. Upon completion of the monitoring, the monitor (s) will perform an exit conference to summarize issues found during monitoring, as well as to offer best practice recommendations. For Technical Monitoring visits, an exit conference may be delayed, conducted via telephone, webinars, etc.

The Monitoring Schedule for 2023 WAP DOE is as follows

Program Monitoring Specific

Notification for program monitoring will include client files, financial information, procurement, training, etc.

Technical Monitoring Specific

Requests for Technical Monitoring include a list of units to visit as well as alternates when clients are unavailable. Sub-grantees are prohibited from revisiting client units chosen by IHCDCA for Technical Monitoring. Units that are found to have been "revisited" prior to the Technical Monitoring visit will result in at least one additional unit being selected for monitoring. IHCDCA may, at its discretion, require a Return of Funds for all expenses associated with the revisited unit thereby removing it as a completed unit. IHCDCA monitoring staff may use alternate procedures or request additional information to verify compliance when it is necessary or deemed appropriate.

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8.4 LIHEAP Program and Technical Monitoring

Monitoring for LIHEAP will be performed in conjunction with DOE monitoring and/or as deemed necessary by IHCDA. LIHEAP monitoring practices will be the same as outlined above for DOE.

For units utilizing both DOE and LIHEAP the monitored process is outlined above. IHCDA estimates that approximately 70% of Weatherization completions in Indiana utilize both DOE and LIHEAP funding.

8.5 Monitoring Reporting Process

Monitoring Report

Each sub-Grantee will receive a copy of the monitoring report within 30 days from completion of the exit conference. The report will identify such areas as training and technical assistance recommendations, summary of program /technical and client file/QCI findings and concerns, funding utilization per client, and NEAT/MHEA/**MuTEA** review.

- **Findings** should be classified as critical in nature and may require immediate corrective action by the sub-grantee (e.g. Health and Safety issue).
- **Concern** do not require immediate action by the sub-grantee and in many cases may not require action at all. These tend to be low to medium intensity issues.

The level of severity (classification as a finding/concern) may be based upon conditions in the field at the time of monitoring.

Findings and Concerns will be noted as:

- **Incomplete Work:**
 - Concern: Incomplete work that is minor, that has little or no cost, does not pose a health and safety issue and is not part of past trends for the agency, and depending on the circumstance may not be required to be repaired.
 - Finding: Incomplete work that includes past trend(s), is associated with a noteworthy cost, may affect the potential energy savings, or is a health and safety issue. These will require remediation.
- **Questioned Costs:**
 - Questioned costs are clarified with the sub-grantee. When deemed unallowable, they will be required to be returned or removed from DOE funding. Questioned costs are subject to additional review.
- **Client Complaints**
 - When clients complain at the field monitoring, each complaint will be reviewed for validity.
- **Major Workmanship Issues**
 - Finding: Major workmanship issues must be resolved by the sub-grantee.
- **Minor Workmanship Issues**
 - Concern: If the minor workmanship issue is part of past trends, then it is treated as a major workmanship issue.

Monitoring Report Response

The sub-grantee must either **Accept** the submitted report or provide an **Informal Appeal** (see Monitoring Appeal Process) to specific findings and concerns. The sub-grantee will have 10 days from the receipt of the monitoring report to submit a written response per the monitoring report.

Any corrective action taken by the sub-grantee is considered an acknowledgment of the finding or concern. Failure by the sub-grantee to respond in writing to the monitoring report by the established deadline may result in claims being held by IHCDA until the proper response is received.

Monitoring Appeals Process

If the sub-grantee informally appeals (disagrees with) any item on the WAP Monitoring Report, the sub-grantee must send an informal appeal via email to IHCDA's Program Monitor within 10 days of the receipt of the monitoring report.

- IHCDA will respond within 10 days of receipt of sub-grantee's Informal Appeal to the Monitoring Report.
 - If IHCDA **agrees** with all items identified in the sub-grantee's **Informal Appeal**, the sub-grantee will receive a revised monitoring report that will be used to ensure all actionable items are completed.
 - If IHCDA **does not agree** (in-full or in-part) with the sub-grantee's **Informal Appeal**, the sub-grantee will receive an **IHCDA Informal Appeal reply**.
- The sub-grantee will provide a **second response** within 10 days. (If applicable)
 - If the sub-grantee **agrees** with the reasons described for not changing items identified in the informal appeal, the sub-grantee's second response is to be sent to the IHCDA.
 - If the sub-grantee **disagrees** (in-full or in-part) with IHCDA's **Informal Appeal** response, the sub-grantee may submit a **Formal Appeal** in writing to the Director of Community Programs. The Director of Community Programs will review the formal appeal and provide a written decision within 30 days. This decision will be final.

Monitoring Completion

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Once all parties are in agreement with all the findings and concerns, the sub-grantee will have 30 days to closeout the monitoring session. The sub-grantee will receive a Monitoring Completion Letter after all completed corrective actions and/or copies of checks paid to IHCDA have been submitted.

8.6 Return of Funds (Monitoring)

A return of funds transaction is initiated when paid grant funds need to be returned due to a monitoring or financial audit issue. A return of funds must be paid out of private agency funds. These funds will show on the claim summary but will not be returned to the sub-grantee's available budget.

Examples of disallowed costs include, but are not limited to:

- Exceeding 25% of total expended funds on Health & Safety measures
- Exceeding the current average cost per unit
- Interest expenses paid with DOE funds
- Rework expenses when job has been closed, except when specifically authorized by IHCDA
- Disallowed equipment and vehicle purchases with DOE funds
- Any measure not cost justified.
- Any repair that exceeds the incidental repair measure limit for materials and labor
- Expenditures incurred for the installation of measures on a completed unit outside the contract period.
- If IHCDA cannot determine an expenditure is allowable because of inadequate records or documentation, IHCDA will request additional documentation. If documentation cannot be produced, the costs will be disallowed.

8.7 Compliance

Compliance is essential in assuring overall program success. Sub-grantees are monitored to determine whether they have continuously met the established program guidelines, government legislation, IHCDA contract, the IHCDA provided Program Manual, and IHCDA Information Memoranda. Failure to meet the minimum monitoring standards will result in corrective action.

Quality Improvement Plan (QIP)

Monitoring visits where serious, numerous, or recurring findings may result in the sub-grantee being placed on a QIP. The intent of the QIP is to help the sub-grantee improve the areas of deficiency. As part of the QIP, IHCDA monitors will make additional visits to the sub-grantee to ensure changes are being implemented and all noted deficiencies are being resolved. The QIP may be modified as deemed necessary by IHCDA to accomplish the needed sub-grantee improvement. Sub-grantees could be placed on a QIP if one or more of the following program deficiencies are identified:

- General Administrative Deficiencies that include but are not limited to late interim or closeout reports, late completion reporting (data entry), lack of procurement policies
- outdated cost allocation plans
- Fiscal Reporting issues that include failure to claim expenses on a monthly basis, repeated occurrences where expenses are submitted more than 45 days after the invoice or purchase order date, contractors paid beyond the 45-day requirement
- Staff or contractors fail to receive proper certifications
- ACPU exceeds cost guidelines set forth by DOE or HHS (LIHEAP) funding
- At least 25% of client files reviewed are deemed ineligible
- High risk outcome on the Risk Assessment
- Repeated concerns and findings on Technical Monitoring

Should the QIP fail to correct the issues, IHCDA will pursue further remedies for noncompliance as allowed in their Weatherization Policy and Procedures Manual, and the sub-grantee grant agreement (contract). The sub-grantee's Weatherization Manager or Weatherization Director may not be the QCI and Energy Auditor combination staff member.

Modified Quality Improvement Plan (MQIP)

Similar to a Quality Improvement Plan, a MQIP requires less oversight and time frame to accomplish the stated compliance objectives.

V.8.4 Training and Technical Assistance Approach and Activities

Indiana's Weatherization Assistance Program currently has 261 Home energy Professional, 37 BPI QCI, 48 EA, around 35 shell crews and 27 Mechanical workers and 11 helpers.

The first Year IHCDA will bolster the current network and ensure the state has a solid foundation to ramp up production while maintaining the necessary quality of work. IHCDA will also hire 3 additional state

employees. IHCDA will specifically target Subgrantees working below the current contract requirements. IHCDA will provide T&TA for the Subgrantees struggling to meet production goals. The training will evaluate and create processes in collaboration with the subgrantees. These processes will improve budgeting, production, and compliance in the

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Weatherization program. IHCDCA has implemented this training in the past which improved production and compliance with great success. The training is provided by Hutson Homes LLC and is listed below in more detail. Additionally, IHCDCA hosts two Semi Annually Manager Meetings (SAMM's) to address specific network issues and knowledge gaps throughout the network.

All form updates are a direct reflection from the most recent DOE monitoring of IHCDCA, IHCDCA monitoring of sub-grantees, and internal state audits. All new training and curricula and changes to current curricula are reflective to the most recent DOE monitoring.

Training Implemented by Hutson Homes LLC Training

1. Costs and Budgets

- Tracking unit expenses
- The process of approving expense sheets per unit for finance
- Reporting unit cost in IWAP
- Reconciling between indirect and direct unit costs
- Reconciling direct unit cost with NEAT/MHEA
- Finding minimum number of units required at current expenses
- Tracking ACPU

2. Production

- Tracking units in production
- Managing units in production
- Moving production forward
- Evaluate monthly goals adding to production as needed
- Writing a process for each step of completing a unit from Audit to QCI, reporting etc...

3. Compliance

- Work on procurement and its process
- Tracking of CEUs and certifications
- On boarding new employees and contractors
- Checks and balances between financial and weatherization production
- Inventory processes and tracking
- Compliance check lists

Indiana utilizes T&TA to properly train all Weatherization Program Managers, Energy Auditors, Quality Control Inspectors, Crew Leaders, Retrofit Installers-SHELL/HVAC, and appropriate Grantee Staff. Training includes those who are in-house personnel and subcontractors working for the Grantee and Subgrantees. The T&TA training also trains and teaches on Monitoring practices. Indiana's Weatherization Training Center is the Indiana Community Action Association (INCAA). INCAA is an IREC Accredited organization covering all four DOE Job Task Analyses (Energy Auditor, Quality Control Inspector, Crew Leader and Retrofit Installer Shell). INCAA received their 5 year re-accreditation on March 18, 2022. INCAA has adopted and utilizes the NREL installer badge toolkit as common practice as well.

T&TA is also utilized to provide sub-grantees with additional technical assistance in the technical and administrative aspects of Indiana's Weatherization Assistance Program. IHCDCA's Policy and Technical Specialist is available daily via phone and/or email to answer programmatic questions. Subgrantees with more serious needs may schedule/request an on-site visit from IHCDCA or INCAA training staff. IHCDCA and INCAA work together closely to ensure that Indiana's Weatherization Assistance Network receives the necessary training to meet DOE and IHCDCA requirements. Adjustments are made throughout the funding cycle as necessary to meet the T&TA needs of Indiana's Weatherization Network.

Subgrantees will be allotted a \$2,000 base award with an additional \$500 for every county serviced by the Subgrantee per reporting cycle for the purpose of providing Training and Technical Assistance for Subgrantee staff and contractors interested in performing weatherization work for the Sub-grantee. These funds may be used to cover only those expenses related to weatherization training, including:

- Class Fees
- Material Fees
- Written / Field Testing
- CEU Events
- Wage / Time reimbursement
- Travel Expenses (excluding meals)
- Lodging
- Providing reasonable meals at annual contractor trainings

Contractors must demonstrate their commitment to providing weatherization services for the Subgrantee by having an active contract with the Subgrantee before being considered for the stipend. Requests for stipends to reimburse contractors without an active contract must be reviewed by IHCDCA. Subgrantees that use a stipend for contractors and staff must provide training documentation to IHCDCA upon submitting claims for the stipend. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets, and BPI student portal information.

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Examples of allowable courses are listed on INCAA's website, as well as those outlined in Policy & Procedure Manual Section 7. Subgrantees must have approval from IHCDA for classes not listed prior to attending if the stipend will be used. Other associated costs related to training not listed above must first be approved by IHCDA. Requests for additional funds will be submitted to IHCDA for review.

Indiana addresses client energy education within the courses taught at INCAA. Comprehensive client education is provided to the Weatherization program through INCAA's Client Education course; however, client education components are also covered in the Energy Auditor, Quality Control Inspector, Retrofit Installer Shell and Mechanical, and the ASHRAE 62.2 courses. Several additional courses taught at INCAA also have components of Client Education embedded into those curriculums. Indiana believes establishing a solid foundation in client education is paramount to attaining optimal energy savings, to ensuring the durability of measures installed, for improvement in indoor air quality, and for building positive relationships between the clients and the WAP personnel. All persons involved in the Indiana WAP play a vital role in establishing effect client energy education. INCAA has available the following classes and trainings for the **annual** DOE funding cycle:

- Retrofit Installer Shell
- Retrofit Installer Mechanical
- Energy Auditor
- Crew Leader
- BPI Quality Control Inspector
- Zone Pressure Diagnostics
- High Performance Insulation
- Daily Safety Test Out Procedures
- Mobile Home Weatherization
- Carbon Monoxide and Combustion Analysis
- Electric Furnace & Heat Pump Inspections for Auditors/QCI's
- Electric Furnace & Heat Pump Inspections for HVAC Professionals
- Oil Furnace Training
- Boiler Inspections
- Vent Systems & Combustion Air Requirements
- Heating System Airflow Diagnostics
- Mechanical Systems for Auditors
- CAZ Pressure Diagnostics for Auditors and Heating Techs
- NEAT/MHEA/MulTEA
- Whole House Heat Load Calculations
- New Furnace Installation Inspections
- Applying The ASHRAE 62.2
- DOE Health & Safety Policy
- Healthy Homes Evaluator
- Communication in Weatherization
- Water Heater Inspection
- Client Education
- SWS for Weatherization Professionals
- Lead Safe Weatherization
- Moisture Assessment
- Testing for DOE's QCI and Energy Auditor Certifications
- Multi-Family QCI Training for QC
- Multi-Family Training Building Analyst for Energy Auditors
- Optimizing Weatherization Program Resources
- OSHA 10
- SHPO Training

Indiana currently requires competency testing for all individuals performing work as an Energy Auditor, Quality Control Inspector, MF Building Analyst, and MF QCI, Retrofit Installer Shell, Retrofit Installer Mechanical and Crew Leader-Shell. The requirements and timelines for these competencies are contained in Indiana's Policy and Procedures Manual Section 7. Section 7 will be included in the Policy and Procedures Manual attached to the SF-424.

Subgrantees are required to ensure that all staff and contractors meet IHCDA and applicable DOE training requirements and properly track training documentation. IHCDA reviews the training documentation and tracking during their monitoring process to ensure compliance. Time Limits for becoming Indiana Weatherization Competent:

- All Subgrantee staff/contractor new employees will have 9 months commencing 45 days from their date of hire to become Indiana Weatherization Competent in the categories of Energy Auditor, Retrofit Installer (Shell and/or Mechanical) and Crew Leader.
- All Subgrantee staff/contractor new employees will have 9 months commencing 45 days from their date of start in specific training for BPI QCI to obtain BPI QCI Certification.
- Subgrantees are allowed to enroll new staff/contractor employees in training prior to the expiration of the 45 days if they choose to do so. This decision should be based upon the expectation that the new staff/contractor employee will be retained in their new position.

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- Subgrantees may shorten the 45 day grace period to 30 days provided this shortened time period is approved by IHCD and included in the Sub-grantee's policy and human resources manuals.

Each IHCD Subgrantee is responsible for accurately tracking all staff and/or contractor competencies and certifications. This tracking must include the following information:

- Individual name and competency(s) and/or BPI certifications held
- Date competencies and/or BPI certifications expire
- Hire date
- Attendance at Annual Competency Maintenance Training
- Current BPI/INCAA Certifications where applicable
- Record of training for 16 hours of CEUs
 - IHCD will verify training records and qualifications of all Subgrantee staff, crew members and contractors annually near the end of March. Subgrantees must be prepared to provide training documentation whenever it is requested by IHCD. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets (conferences for example), and BPI student portal information. IHCD may, at their discretion, monitor the tracking and completion of the required training at times other than listed in the bullet point above.

Comprehensive client education is provided to the Weatherization program through INCAA's Client Education course; however, client education components are also covered in the Energy Auditor, Quality Control Inspector, Retrofit Installer Shell and Mechanical, and the ASHRAE 62.2 courses. Several additional courses taught at INCAA also have components of Client Education embedded into those curriculums. T&TA activities that took place in Indiana during the **annual** DOE grant cycle include, but are not limited to the following:

- National DOE BPI Quality Control Inspector certification training and testing activities
- National DOE BPI Energy Auditor certification training and testing activities
- National DOE Multifamily Building Analyst training and certification activities
- BPI Healthy Home Evaluator training
- Indiana Competency training and testing for Energy Auditor
- Indiana Competency training and testing for Retrofit Installer Mechanical, Retrofit Installer Shell & Crew Leader
- Indiana Competency Maintenance Trainings ASHRAE 62.2 - 2016 Training
- SWS for Weatherization Professionals
- Participation in and attendance by IHCD staff to both NASCSP Conference. Attendance by INCAA Training Team Leader to Winter NASCAP Conference
- On-site T&TA at IHCD provided by NASCSP
- Sub-grantee on-site T&TA activities statewide with IHCD staff
- Sub-grantee on-site T&TA activities statewide with INCAA training staff
- Two (2) Semi-Annual Managers Meetings, hosted by IHCD
- Four (4) Semi-Annual Technical Trainings, hosted by INCAA
- Certification/Competency Maintenance Trainings T&TA for Indiana's Field Guide/SWS document
- Maintenance of Indiana's site built and mobile home waiver audits
- Increased training on NEAT/MHEA/MulTEA auditing software

T&TA Activities anticipated to take place during the **annual** DOE Funding Cycle include, but are not limited to the following:

- Continued testing for BPI QCI and DOE/BPI Energy Auditor Certification
- Testing for BPI Crew Leader Certification
- Testing for BPI Healthy Home Evaluator Certification
- Continued participation and attendance to NASCSP Conferences Continued training and testing for Indiana's competencies
- Work with Sub-grantees and INCAA training staff to develop quarterly "Best Practice" T&TA meetings that allow:
 - Weatherization staff to share successful processes and practices
 - Provide Optimizing Weatherization Resources Training for Sub-grantee Executive Directors & financial staff
 - Provide RRP initial and refresher training for Indiana's Weatherization Network Provide OSHA 10-hour training opportunities
 - Provide Multi-family Building Analyst and QC training
- Enhanced focus on NEAT/MHEA/MulTEA training and use within Indiana's Weatherization Network
- Research and Development by INCAA on improving forms, researching current practices, etc.
- Provide MULTEA training for Multi-Family audits

In 2019, Indiana received the energy savings results from PRISM/BEAcon to evaluate energy savings at each subgrantee. This program was used to evaluate one year pre- and post-weatherization utility usage of metered fuels. These results are shared with sub-grantees revealing their individual results along with the state averages. Each sub-grantee is encouraged to evaluate the savings information to see how they performed individually and in comparison to the state average. The information shared from PRISM/BEAcon also breaks down the performance of each contractor and energy auditor. Subgrantees are also encouraged to look at this information to identify top performers and those who may need additional training or oversight

In the past, savings information was utilized as part of Indiana's incentive pool for future and active funding opportunities. In PY 2023-2024 IHCD does not plan to use the incentive pool, because the energy savings data is not available from the previous program year.

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Below are the increased allocation guidelines if IHCDA opts to use:

Sub-grantees are encouraged to use energy analysis and evaluations in program decisions. IHCDA will hold back a certain percentage that can be given out on request to sub-grantees who have spent out their allocation.

Indiana may opt to utilize an increased allocation process in conjunction with issuing funding allocations that promotes energy savings and sound program management. DOE allocations are distributed using the census-based allocation formula for 50% of Weatherization sub-grantees contracted funds. IHCDA will review benchmarks yearly and allocate as necessary. The remaining 50% of the allocation is distributed out to those Weatherization sub-grantees who meet all of the following criteria:

1. 90% or more of the prior reporting cycle contract total must have been expended.
2. Annual Closeout Reports must be submitted and approved on time (within 45 days after the annual reporting cycle ends). IHCDA DMS, IWAP Quarterly, Job Expense and sub-grantee annual closeout report must match exactly when final claims are processed, with all line items and averages being within allowable limits.
3. No Weatherization sub-grantee operating under a 120-day or modified Quality Improvement Plan (QIP) will be included in the increased allocation process.
4. Weatherization sub-grantees must demonstrate regular use of the XRF for lead based paint testing.
5. Sub-grantee must meet the 45 day requirement for vendor and sub-contractor payments

To meet requirements within [WPN 22-4](#) IHCDA added the following language to their Subgrantee contracts:

“Subgrantee shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Indiana, the Indiana Weatherization Field Guide, the Indiana Weatherization Policy and Procedures Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively “State Weatherization Plan and Directives”). Upon completion of the document aligning Indiana’s Weatherization Field Guide and DOE’s Standard Work Specifications (SWS), Subgrantee shall abide by and perform all work in accordance with said document. The Sub-grantee’s signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.”

“Subgrantee shall ensure that all Weatherization staff and sub-contractors who perform or provide Weatherization services to client units receive and adhere to all standards as outlined in Indiana’s Weatherization Field Guide, Indiana’s Weatherization Policy and Procedures Manual, the Department of Energy Weatherization Assistance Program State Plan for Indiana and other State Weatherization directives as applicable. Upon completion of the document aligning Indiana’s Weatherization Field Guide and DOE’s Standard Work Specifications (SWS), sub-grantee shall abide by and perform all work in accordance with said document. The sub-grantee’s signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client units by them.”

Prior to issuing the PY 2023-2024 DOE Grant Agreements, IHCDA ensure the above language is included to indicate that all work performed will meet or exceed Indiana's Weatherization Field Guide/SWS aligned document.

Tier 1 and Tier 2 Training:

Indiana will continue to work with INCAA to provide the needed Tier 1 and Tier 2 training as required by [WPN 22-4](#). For Tier 1 training, INCAA continues to offer training for

- Quality Control Inspector
- Energy Auditor
- Retrofit Installer Shell
- Crew Leader.

For Tier 2 training, INCAA continues to offer the following, but are limited to the following training opportunities:

- Moisture Assessment
- Daily Safety Test Out
- Retrofit Installer Mechanical
- Lead Safe Work Practices
- Applying ASHRAE 62.2 – 2016
- Optimizing Weatherization Resources
- Program Management
- SWS
- Client Education
- CAZ Pressure Diagnostics
- NEAT/MHEA/MulTEA training
- Mechanical Systems for Auditors
- Electric Furnace and Heat Pump Inspections
- Vent Systems and Combustion Air Requirements
- Boiler Inspections
- Carbon Monoxide and Combustion Analysis
- Oil Furnace Training
- New Furnace Installation Inspections.

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INCAA's class registration system is capable of placing students on a waiting list if a class is full at the time of registration. By utilizing the waiting list, INCAA, in cooperation with IHCD, can monitor the need for classes and change the schedule as necessary. INCAA utilizes this information to populate the classes as they move forward through the grant cycle.

IHCD recognizes that the primary focus for Tier 1 training during the 2021-22 Program Year to be on all Tier 1 training, including Quality Control Inspector, Energy Auditor, Retrofit Installer Shell and Crew Leader. INCAA will continue to offer a Multifamily QC course, the most recent offering being in 11/2021.

IHCD understands the importance of ensuring that the new information contained within [WPN 22-7](#)

Health & Safety guidance, as well as Indiana's updated SWS-aligned Field Guide, is fully realized and understood by all sub-grantees and contractors within the Weatherization network. IHCD will continue to support efforts to position Indiana's WX Network to test for the national Energy Auditor Certification. INCAA has incorporated all components of [WPN 22-7](#) into the Client Education course in addition to periodically offering a training course. Additionally, INCAA provides SWS training for Weatherization Professionals. The Semi-Annual Technical Trainings, Competency Maintenance Refresher, Semi-Annual Managers meetings courses are designed to specifically include addressing updates or changes in DOE, IHCD, SWS, Code, etc throughout each FY.

The following is from Section 7 of the PY 2023-2024 Policy & Procedure Manual.

Section 7: Training

7.1 Importance of Training

Due to the ever-changing and highly technical nature of the WAP, a high priority has been placed on the training aspect of the program. Technical assistance provides guidance and assistance on specific issues/questions found in all aspects of Weatherization. Training and technical assistance in the field, via telephone or email, is provided by either INCAA training staff or IHCD staff. This assistance is provided to all sub-grantee contractors and sub-grantee staff including but not limited to executive directors, fiscal staff, program managers, and all other weatherization employees. Sub-grantees and contractors are strongly encouraged to take full advantage of the opportunities available to them for program enhancement and improvement through training and technical assistance.

IHCD continues to maintain a strong position that the Indiana WAP will maintain its high levels of technical expertise and energy savings through the continued emphasis on its training and technical assistance component. Ongoing training and sub-grantee program/technical monitoring are tools which IHCD utilizes to ensure that weatherization measures are applied consistently, and that Indiana maintains a high standard of work. IHCD implements training requirements to ensure that funds provided are used on weatherization measures that will enhance energy savings while ensuring the health and safety of the unit occupants. By including all weatherization professionals in this process, it ensures organizational performance while providing the means for evaluating weatherization achievements and as developing plans to improve upon Indiana Weatherization.

In Indiana, Weatherization specific training and technical assistance is offered by the Indiana Community Action Association (INCAA). INCAA is an Interstate Renewable Energy Council (IREC) accredited training center. INCAA will be providing training in PY 2023-2024. Lead Risk Assessor and Lead Inspector training is offered by the Environmental Management Institute (EMI).

Weatherization professionals can find Indiana Weatherization Field Guide, Health & Safety Plan guidance, and current State Plan at MyIHCD's [Program Partners](#).

At the beginning of each DOE program year, sub-grantees are required to submit a list of weatherization program professionals—in house staff and contractors to IHCD and INCAA. IHCD will only fund training for weatherization professionals on the submitted and updated list. Any changes in staffing must be reported to IHCD and INCAA immediately. Sub-grantee Executive Directors and Weatherization Program Managers may only request and view testing results for their employees or sub-contractors.

Time Limits for becoming Indiana Weatherization Competent:

- All sub-grantee staff/contractor new employees will have 9 months commencing 45 days from their date of hire to become Indiana Weatherization Competent in the categories of Energy Auditor, Retrofit Installer (Shell and/or Mechanical) and Crew Leader. IHCD will not fund training beyond the 9 months and 45 days from the day of hire if the person does not become weatherization competent.
- All sub-grantee staff/contractor employees must have a completed background check prior to being allowed to work in/on client units. IHCD's specific requirements for background checks are detailed in this manual.

7.2 Certifications

In order to be employed as a Weatherization Professional, one must be working toward or must hold at least of one of the following certifications. Indiana has established Weatherization competency standards known as the Indiana Skills Verification (ISV) competencies. The Building Performance Institute in conjunction with DOE have established competency standards as well. The following credentials are recognized for weatherization professionals working in Indiana:

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- ISV Energy Auditor
- ISV Retrofit Installer for Shell Professionals
- ISV Retrofit Installer for Mechanical Professionals
- ISV Crew Leader for Shell Professionals
- BPI Energy Auditor
- BPI Quality Control Inspector
- BPI Crew Leader for Shell Professionals
- BPI Healthy Home Evaluator
- Indiana Approved Pre-Audit Inspector

The Program Management class is required for all new program managers and strongly recommended for all program managers.

INCAA provides training and certification opportunity for all the above-mentioned certifications.

7.3 Minimum Training Requirements

In order to ensure their safety, all professionals working in Indiana Weatherization who enter client units are required to successfully complete the following courses:

- OSHA 10

Sub-grantees will have 9 months and 45 days to obtain the following training:

- **Lead Safe Weatherization**
- **Moisture and Mold Awareness**
- **Asbestos Awareness**
- **See special provisions for mechanical helpers**

Energy Auditors working in Indiana Weatherization are required to successfully complete the following courses and the applicable examinations:

- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Retrofit Installer blocks for Shell Professionals
- Mechanical Systems for Auditors
- Worst Case CAZ Depressurization
- NEAT/MHEA/MulTEA
- ASHRAE 62.2
- SWS for Auditors/QCI/Program Managers
- Energy Auditor

Quality Control Inspectors working in Indiana Weatherization are required to successfully complete the following courses and the applicable examinations:

- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Retrofit Installer blocks for Shell Professionals
- Mechanical Systems for Auditors
- Worst Case CAZ Depressurization
- NEAT/MHEA/MulTEA
- ASHRAE 62.2
- Energy Auditor
- SWS for Auditors/QCI/Program Managers
- Quality Control Inspector

Designated Indiana Pre-Audit Inspectors (holding no other certifications) working in Indiana Weatherization are required to successfully complete the following courses:

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- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Healthy Homes Evaluator
- Pre-audit inspectors may not enter client units without supervision of an Indiana certified Weatherization Professional until successful completion of each of the abovementioned courses.

Retrofit Installer for Shell Professionals working In Indiana Weatherization are required to successfully complete the following courses and the applicable examinations:

- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Retrofit Installer blocks for Shell Professionals
 - Introduction to Weatherization
 - Blower Door
 - Airsealing
 - Airsealing Field Class
 - Insulating Basics
 - Foam Insulation and Information
 - Insulation Field Class

Crew Leader for Shell Professionals working in Indiana Weatherization are required to successfully complete the following courses and the correlating examinations:

- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Retrofit Installer blocks with Badge Completion
- Crew Leader for Shell Professionals (3 day)
- New SWS Class
- It is highly recommended that the Crew Leader also hold the EPA RRP Lead Renovator Certification.
- A crew leader is required to be on a job site at all times

Retrofit Installer Mechanical Professionals working in Indiana Weatherization are required to successfully complete the following courses and the correlating examinations:

- OSHA 10
- Lead Safe Weatherization
- Moisture and Mold Awareness
- Mechanical Systems for HVAC Professionals

Retrofit Installer Mechanical Helper are required to successfully complete the following:

- OSHA 10
- Mechanical Helpers are not allowed to be on client premises without the Retrofit Installer Mechanical Professional also being on the premises.

Indiana Skills Verification Standards

All individuals desiring to become ISV certified must be sub-grantee staff, contractors, or contractor employees holding a current contract with the sub-grantee unless IHCD provides prior written approval to the sub-grantee and INCAA.

- Mechanical Helpers are not required to hold ISV certification.
- ISV written testing is administered at the end of the Retrofit Installer for Shell Professionals, Crew Leader, Retrofit Installer for Mechanical Professionals,

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and Energy Auditor courses.

- The results of ISV written and field testing will be tracked by INCAA. The results of the ISV written and field testing will be available to IHCDA, the sub-grantee Weatherization Program Manager, and the sub-grantee Executive Director upon written request to the INCAA Weatherization Training Team Lead

Specialty Contractors

- Specialty contractors who are performing limited, rarely utilized services such as specialty plumbers, exterminators, mold remediation, or specialty electricians **are not** required to hold ISV certification.
- Specialty contractors who complete work in units which results in changes to exhaust systems, ventilation systems or the tightening of the unit **are required** to complete the Daily Safety Test Out (DSTO) training at INCAA and **are required** to complete a DSTO form upon completing their work on the unit. Or a representative from the subgrantee must complete the DSTO at the end of each specialty contractor work day when applicable.

Testing Parameters

Becoming Indiana Weatherization Competent will require passing both a written exam and field exam. The skills exam will involve performing skill sets associated with the competency category being tested.

- Both the written and field test are pass/fail. There will be no provisional results given.
- Should retesting of the skills verification be necessary only the portion failed by the candidate will need retested.
- Should retesting of the written test be necessary, the entire written test must be completed.
- All testing results will be sent to the candidate, the sub-grantee Weatherization Program Manager and the sub-grantee Executive Director.
- Candidates will have three opportunities to pass all testing to become Indiana Weatherization Competent. Individuals that fail to pass competency on the third attempt will be required to submit a formal request to IHCDA for reapplication to work in Indiana's Weatherization Assistance Program for consideration.
 - An individual would be able to continue working in a competency that has been achieved and they hold, even if they failed the second attempt for an additional competency. For example: if an individual has become Indiana Weatherization Competent as a Retrofit Installer Shell, this same individual tests to become a Crew Leader but fails three attempts. This individual would be allowed to work in Indiana's Weatherization Assistance Program as a Retrofit Installer Shell but not perform the duties of a Crew Leader.
- Should a second attempt at passing competence be needed, the second attempt shall take place no later than **3 months** following the initial attempt.
- IHCDA will only pay for the first attempt for an individual to pass competency. In the case of a failed attempt, the sub-grantee or contractor will be responsible for the cost of any subsequent test procedures.
- Competency testing must take place no later than the conclusion of the 9-month training period commencing 45 days from their hire date.

See BPI's [Certified Professionals](#) designations (Energy Auditor, Quality Control Inspector, Crew Leader, Healthy Homes Evaluator). IHCDA will only fund the first attempt for BPI testing for each designation.

7.4 Duration, Maintenance, and Recordkeeping

Each Indiana competency will be in effect for 3 years. At the end of the 3-year duration each competent individual must re-test and pass the skills verification portion of their competency(s). Each candidate will have three opportunities to pass the skills verification portion of their competency(s). IHCDA will only pay for the first attempt for an individual to pass competency. In the case of a failed attempt, the sub-grantee or contractor will be responsible for the cost of the second testing event. At the end of 3 years, individuals holding competencies as both Retrofit Installer Shell and Crew Leader will only need to test for and pass the Crew Leader competency. Passing the Crew Leader skills portion will initiate the next 3-year cycle for both the Retrofit Installer Shell and Crew Leader competencies. From that point forward, both competencies will have the same expiration dates.

Individuals are required to perform the Crew Leader testing based upon which competency expires first. For example, an individual's Retrofit Shell Competency expires on April 15, 2016 while their Crew Leader expires on June 30, 2016. This individual is required to perform the Crew Leader testing PRIOR to the April 15th date – it is the competency that expires first. The BPI Quality Control Inspector certification is also in effect for 3 years. All BPI requirements regarding the QCI certification must be followed to maintain this certification. All Indiana Weatherization Competent, QCI and BPI certified individuals are required to attend an Annual Competency Maintenance Training in years 2 and 3 of their competency(s) or BPI Certification. If a certification expires and is not renewed concurrent to the certification expiration then written notification must be sent to IHCDA with a request for extension and allowances for a timely recertification must be made.

The Program Manager must keep and maintain up to date records of all weatherization professional certifications and training information on file and have access to the records at all times. This tracking must include the following information:

- Individual name and competency(s) and/or BPI certifications held
- Date competencies and/or BPI certifications expire

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- Hire date
- Attendance at Annual Competency Maintenance Training
- Current BPI/INCAA Certifications where applicable
- Record of training for **12** hours of CEUs

Continuing Education Units

The requirement of Continuing Education Units (CEUs) is designed to ensure that Indiana’s Competent and Certified individuals increase their knowledge base beyond what is necessary to obtain the competency. This is one way that IHCDA is helping to ensure that each client’s unit receives the highest quality of Weatherization services possible.

- Record of CEUs **must** be tracked by the **sub-grantee** for their Weatherization staff, crews, and contractors.
- The **12** CEUs requirement is per individual and not per competency. For example, an individual holds competencies for both Retrofit Installer Shell and Energy Auditor. This individual is only required to obtain **12** CEUs.
- Sub-grantees must track the training that was taken connected to the claimed CEUs for review at time of monitoring. This tracking must include documentation verifying completion of the training, who performed the training and the length of time that the training lasted.
- **Non-technical training for CEUs is limited to four (4) hours.**
- The requirement for CEUs begins the following **Program Year** that an Indiana Competency is obtained.
-
- BPI requires that individuals holding BPI certifications obtain 24 CEUs over the 3-year duration of the certification.

The following is a list of examples of training that apply toward the **12 hours of Indiana CEU:**

CEU Ratio	CEU Category	Example	Documentation required	Limitation
1 hour training : 1 CEU	INCAA or IHCDA Provided T&TA	Training on site	<ul style="list-style-type: none"> • Sign in sheet with date and time • Instructor’s name • Location 	None
1 hour training : 1 CEU	Weatherization Specific Conference	Affordable comfort, HPC, Energy out West	<ul style="list-style-type: none"> • Sign in sheet with date and time • Instructor’s name • Location 	None
1 hour training : 1 CEU	Manager/Technical training	SATT, CMR	<ul style="list-style-type: none"> • Email confirmation of attendance 	None
2 hours training : 1 CEU	Non-weatherization specific courses and respective refreshers	Lead, mold, OSHA	<ul style="list-style-type: none"> • Certificate or card required 	10 CEU / certificate cycle
4 hours training : 1 CEU	Training provided by manufacturers that promotes specific model or style produced by manufacturer	Installation of Navien water heaters, class provided by Navien about Navien	<ul style="list-style-type: none"> • Sign in sheet with date and time on manufactory’s letterhead • Instructor’s name and contact information • Summary of how training will improve weatherization 	None

The following is a list of examples of training that DO NOT apply toward CEUs:

- The required training to obtain a **first** competency DOES NOT count toward CEUs. For example – someone is taking the 5-day Energy Auditor training to obtain their Energy Auditor Competency. This 5-day class DOES NOT count as CEU’s – it is required to obtain the competency (For instance, if the above person takes a CAZ class to supplement the Energy Auditing training, the CAZ class DOES count toward their CEUs).
- Classes outside of INCAA that do not pertain to Weatherization skills and topics
- Classes that are taken for which the Sub-grantee has no documentation of class completion or attendance

Please note that these are not exhaustive lists. Questions regarding whether or not a particular training would/should apply toward the **12** hours of continuing education should be directed to IHCDA prior to attending the training.

Questions regarding industry specific training being allowed to count toward the **12** hours of training should be directed to IHCDA.

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IHCDA recommends that the required CEUs be obtained through training offered through the accredited Weatherization courses offered at INCAA.

IHCDA will verify training records and qualifications of all sub-grantee staff, crew members and contractors annually near the end of March. sub-grantees must be prepared to provide training documentation whenever it is requested by IHCDA. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets (conferences for example), and BPI student portal information. IHCDA may, at their discretion, monitor the tracking and completion of the required training at times other than listed in the bullet point above.

7.5 Additional Competency/Training Requirements

IHCDA staff and contracted monitors responsible for evaluation of sub-grantee administrative performance are required to complete at least 8 hours of administrative training per year.

IHCDA staff and contracted monitors responsible for evaluation of sub-grantee technical performance are required to complete at least 10 hours of technical training per year; and are required to be either Indiana Weatherization Competent as an Energy Auditor or BPI certified as an Energy Auditor and be certified as a BPI Quality Control Inspector.

Weatherization Program Managers responsible for the administration of the Weatherization Assistance Program at the sub-grantee level are required to attend all Semi-Annual Managers Meetings (SAMM) as well as any other required administrative offerings provided by IHCDA. If a Weatherization Program Manager is not able to attend any required training, an appropriate representative from the sub-grantee must attend in their place. SAMM's will be held twice per year and other administrative courses will be held as deemed necessary by IHCDA. When possible, IHCDA will attempt to host trainings via webinar, video conferencing, distance learning, or conference calls. Each sub-grantee is required to send at least one technical representative for their field staff/contractors to all Semi-Annual Technical Trainings (SATT). Failure to do so could result in repercussions from IHCDA.

Verification of LSWP/Moisture certification is not required after 4 years of continuous employment in the Indiana WAP as an ISV mechanical, crew leader, shell, audit or QCI.

7.6 Additional Training Opportunities

IHCDA utilizes INCAA as the Indiana Weatherization Training Center and for Technical Assistance. Course subjects, course descriptions, length of classes, prerequisites, and schedules are located on INCAA's [website](#).

Classes are filled on a first come-first served basis. Once a class is filled, sub-grantees and contractors are encouraged to continue to register for the filled class so they can be placed on the waiting list. It is not uncommon for a spot to open 3 to 5 days prior to the class. To be placed on the waiting list individuals must register for the class. A sub-grantee may also contact the INCAA Training Team Leader to request a specific course be taught at the sub-grantee agency address. A sub-grantee or contractor may also request on site training or technical assistance from the INCAA training staff. It should be noted all courses may not be suitable for being held at the sub-grantee address, but INCAA will make these accommodations when possible.

Sub-grantee staff and contractors may also contact INCAA training team staff directly to request on-site Training and Technical Assistance to be held at specific job sites. These on-site T&TA opportunities will earn attendees one CEU per hour of T&TA.

7.7 Background Checks

In order to protect the safety of clients receiving weatherization services, sub-grantees must perform a criminal background check and employment verification prior to the employment of sub-grantee/contractor employees planning to work with clients or in the unit of client's being rehabilitated or weatherized as a part of Indiana's Weatherization Assistance Program. IHCDA is instituting a look-back period for convictions to 7 years for individuals employed by sub-grantees for the Weatherization program. This policy mirrors the State's employment policies. The criminal background report must contain a criminal background check which includes the following:

- State and county records from all 50 states including data from courts, sexual offender registries and department of correction records.
- An Indiana criminal history check which contains records of criminal convictions or currently pending criminal charges in counties throughout the State of Indiana.
- A Social Security Number (SSN) Trace which provides names and addresses associated with a social security number along with the date and state of its issuance (this is a tool to aid in verifying the identity and location of a particular applicant).
- Confirmation of employment dates and job titles held with previous employers, the reason for leaving, and eligibility for rehire, if available.
- Sub-grantees must use careful consideration when analyzing the results of the reports and follow their internal agency policies. Must prohibit employment of anyone appearing in any sex offender registry. Deviations from internal policies must be discussed and approved by their board of directors.

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- Sub-grantee Weatherization Program Managers are encouraged to work with their Human Resources and Executive Staff personnel to develop acceptable hiring practices based upon background check results.
- It is the sub-grantee's responsibility to ensure that this background check is performed and properly tracked for all sub-grantee weatherization staff and contractor employees.

7.8 Compliance Issues

IHCDA will evaluate compliance with competency and other required training annually. Sub-grantees must be prepared to provide IHCDA with training documentation whenever it is requested by IHCDA.

The sub-grantee must ensure that all persons meet the applicable certification and training requirements. If a sub-grantee has been found to have a person(s) working or worked on a weatherization unit without the above-mentioned requirements, IHCDA may take the following steps:

- Issue a written finding with a timeline for resolution of the non-compliance issues
- Require re-works or re-inspections at the sub-grantee/contractor expense
- Require repayment of all funds claimed for the affected Weatherization work
- Hold the sub-grantees weatherization financial claims until all issues are properly addressed
- Temporarily suspend the noncompliant person from performing work in Indiana's Weatherization Assistance Program.

IHCDA will review sub-grantee compliance through sub-grantee files (tracking) and INCAA training records. It is the responsibility of the sub-grantee to identify within the client file each individual who entered the unit.

7.9 Roles and Responsibilities

Energy Auditor

An energy auditor is a residential energy-efficiency professional who evaluates the energy efficiency and health & safety of a unit and conducts field measurements and diagnostic testing to identify areas for energy savings and enhancements. The energy auditor produces a work order based upon the information gathered to direct the energy efficient work and installed measures for units to be weatherized.

Quality Control Inspector

A quality control inspector (QCI) is a residential energy-efficiency professional who ensures the completion, appropriateness and quality of energy efficiency upgrade work and installed measures. Per [WPN 22-4](#), the QCI is an individual that has no involvement in the prior work on the unit either as the auditor or as a member of the crew. IHCDA will monitor a minimum of 5% of DOE completions.

- Separation of duties between the Energy Auditor and QCI must be clearly defined and not crossed
- Weatherization Program Managers who would like to perform QCI must obtain prior IHCDA approval
- The QCI must take every precaution necessary to not become involved in the decision-making process regarding the work being performed at the unit
- All additional work or needed re-work should be brought to the attention of the WX Program Manager or Energy Auditor and not handled directly by the QCI.
- Crew Leaders should seek guidance on performing work from the WX Program Manager or Energy Auditor.

IHCDA Expectations and Best Practices for Indiana's Weatherization Network

IHCDA allows two options for meeting the Quality Control Inspection requirement. Sub-grantees must apply to IHCDA in order to be able to utilize the Energy Auditor as the QCI option and must indicate their intended method to IHCDA for consideration. Sub-grantees that do not submit a plan to IHCDA will be required to utilize a QCI that was not the Energy Auditor.

When Energy Auditor is QCI

The auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the unit. Because this model does not allow for an independent review of the audit on every unit, IHCDA is required to increase the percentage of quality assurance reviews to ensure that audits are being performed consistently and correctly. IHCDA will monitor a minimum of 10% of DOE completions.

Inspectors shall not participate in professional activities involving a conflict of interest. A conflict of interest occurs when an inspector is inappropriately motivated by any financial, personal, or professional incentive other than the production of a professional report that clearly, completely, and usefully reflects the conditions observed during the audit. Inspectors shall avoid, whenever possible, even the appearance of a conflict of interest and shall disclose all potentially questionable associations and relationships in advance to IHCDA with a legitimate right to be informed of them.

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Inspectors shall not inspect work performed by organizations under arrangements whereby any compensation or future referrals to the inspector depend on or are influenced by the findings of the report. Compensation includes direct and indirect remuneration as well as substantial gifts and favors. Inspectors shall not accept any form of compensation for recommending products or services to clients or other parties having an interest in the inspected work.

Additional documentation may be required by IHCDA if necessary, including:

- Documentation of the independent status of the Quality Control Inspector
- Documentation outlining any involvement of the QCI in the audit process

Quality control inspections are subject to IHCDA assessment of effectiveness and compliance with program inspection policies and monitoring will include documentation of any findings related to the quality of the inspection and impartiality of the inspection process. IHCDA will maintain tracking of all sub-grantee QCI activities to include all aspects of the sub-grantee developed QCI process, subsequent corrective actions, and final outcomes.

If sub-grantees are found to be out of compliance, remedial training may be required for the QCI, the installation contractor, and/or sub-grantee staff. Limited remedial training may be provided by IHCDA staff onsite at the time of the monitoring, or more extensively through the training facility at INCAA if necessary. Alternatively, IHCDA staff may provide more comprehensive training at a later date. Repeated noncompliance issues after remedial training may result in the agency being placed on QIP, or a reduction in funding. All compliance issues found with QCIs are subject to IHCDA review and may result in the QCI not being allowed to perform inspections for Indiana WAP.

Sub-grantees are required to ensure that each weatherization completion receives an appropriate and properly executed QC inspections. This inspection must be performed by a BPI certified Quality Control Inspector (QCI). IHCDA, as part of their regular monitoring procedures, will review QC inspection forms, sub-grantee inspection processes and completed units to ensure the inspections are being performed correctly and in a manner that meets DOE expectations. [WPN 22-4](#).

Failure by the sub-grantee to utilize the QCI process correctly may result in the associated completion(s) being considered unallowable, and all associated cost being returned to IHCDA. Should multiple instances of poorly performed inspections be found, IHCDA will, at the very minimum, place the sub-grantee on a Quality Improvement Plan (QIP).

7.10 Training Stipend

Sub-grantees will be allotted a \$2,000 base award through the DOE award with an additional \$500 for every county serviced per grant cycle for the purpose of providing Training and Technical Assistance for sub-grantee staff and contractors performing weatherization work for the sub-grantee. Sub-grantees can request additional T&TA stipend on a first come first served basis. These funds may be used for expenses related to weatherization training, including:

- Class Fees
- Material Fees
- Written / Field Testing
- CEU Events
- Salary / Wage / Time reimbursement
- Travel Expenses (excluding meals)
- Lodging
- Providing reasonable meals at **annual** contractor trainings

Contractors must have an active contract with the sub-grantee before being considered for the stipend. Requests for stipends to reimburse contractors without an active contract must be reviewed by IHCDA.

Sub-grantees that use a stipend for contractors and staff must provide training documentation to IHCDA upon submitting claims for the stipend. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets, and BPI student portal information.

Examples of allowable courses are listed on INCAA's [website](#), as well as those outlined in this section. Sub-grantees must have approval from IHCDA for classes not listed prior to attending if the stipend will be used. Other associated costs related to training not listed above must first be approved by IHCDA.

Percent of overall trainings

Comprehensive Trainings:	48.0
Specific Trainings:	52.0

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Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	40.0
Percent of budget allocated to Crew/Installer trainings:	40.0
Percent of budget allocated to Management/Financial trainings:	20.0

V.9 Energy Crisis and Disaster Plan

IHCDA will follow the guidance for Energy Crisis and Disaster Plan as outlined in [WPN 12-7](#).

The primary allowance of this program notice would allow IHCDA to install incidental repair measures as deemed necessary and in accordance with IHCDA and DOE policy, appropriate and associated health and safety cost necessary for weatherization to continue, the ability to perform reweatherization without regard to the date of weatherization, and paying weatherization personnel to perform duties such as securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response. However, using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.

Incidental and health and safety related expenses are required to meet both DOE and IHCDA guidelines. Incidental repair costs as outlined in NEAT/MHEA/MuTEA must be followed if the NEAT/MHEA/MuTEA audit is utilized.

All actions taken in response to an energy crisis would be governed by [WPN 12-7](#), [10CFR 440.18](#) and require approval from IHCDA prior to engaging in any disaster related activity.